

EXHIBIT 34

In The Matter Of:

ASHOT EGIAZARYAN

v.

PETER ZALMAYEV

ASHOT EGIAZARYAN - Vol. 1

January 18, 2012

***REDACTED FILE
CONFIDENTIAL PORTIONS
BOUND SEPARATELY***

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225 Varick Street
10th Floor
New York, NY 10014
Phone: 212.557.7400
Fax: 212.692.9171

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----x

ASHOT EGIAZARYAN,

Plaintiff,

Civil Action No.

-against-

11 CIV 2670

PETER ZALMAYEV,

Defendant.

-----x

January 18, 2012

10:13 a.m.

REDACTED FILE

CONFIDENTIAL PORTIONS BOUND SEPARATELY

Videotaped deposition of ASHOT
EGIAZARYAN, pursuant to notice, at the
offices of Salisbury & Ryan LLP, 1325
Avenue of the Americas, New York, New
York, before Gail F. Schorr, a Certified
Shorthand Reporter, Certified Realtime
Reporter and Notary Public within and for
the State of New York.

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<p>1 APPEARANCES: 2 FLEMMING ZULACK WILLIAMSON ZAUDERER LLP 3 Attorneys for Plaintiff 4 One Liberty Plaza 5 New York, NY 10006 6 BY: JONATHAN D. LUPKIN, ESQ. 7 JASON T. COHEN, ESQ. 8 -and- 9 MARK C. ZAUDERER, ESQ. 10 (jlupkin@fzwz.com) 11 (mzauderer@fzwz.com) 12 (jcohen@fzwz.com) 13 HAMBURG & GOLDEN, P.C. 14 Attorneys for Defendant 15 1601 Market Street, Suite 3310 16 Philadelphia, PA 19103-1443 17 BY: JAMES P. GOLDEN, ESQ. 18 (goldenjp@hamburg-golden.com) 19 SALISBURY & RYAN LLP 20 Attorneys for Defendant 21 1325 Avenue of the Americas 22 New York, New York 10019-6026 23 BY: ANDREW J. RYAN, ESQ. 24 (ar@salisburyryan.com) 25 MURANOV, CHERNYAKOV & PARTNERS Attorneys for Defendant Bld. 6, 23 Denisovskiy Lane Moscow, Russian Federation, 105005 BY: ALEXANDER MURANOV, ESQ. (a.muranov@rospravo.ru) ALSO PRESENT: VALERII M. SCHUKIN, Interpreter IGOR VESLER, Check Interpreter RYAN McMULLEN, Videographer</p>	<p>1 2 Egiазaryan, and with me are my 3 colleagues Jason Cohen and Mark 4 Zauderer, both from my firm. Good 5 morning. 6 MR. GOLDEN: I guess I should 7 say with me are Alexander Muranov 8 from Moscow, and Andrew Ryan. 9 THE VIDEOGRAPHER: Will the 10 court, Gail Schorr of Merrill Legal 11 Solutions, please swear in each of 12 the interpreters. 13 MR. LUPKIN: Before we do 14 that, I should also say Mr. 15 Holiner, as we discussed, is 16 participating over the internet, 17 not participating, but just 18 following the Q&A, so I wanted to 19 make that known for the record. 20 MR. GOLDEN: We talked about 21 that. Is there anybody other than 22 Mr. Holiner who is watching, 23 reading along with us? 24 MR. LUPKIN: No, just us. 25 It's just Mr. Holiner.</p>
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<p>1 2 THE VIDEOGRAPHER: This is the 3 video operator speaking, Ryan 4 McMullen of Merrill Legal 5 Solutions, 225 Varick Street, New 6 York, New York 10014. Today is 7 Wednesday, January 18th, 2012. The 8 time on the video monitor is 10:13 9 a.m. We are at the offices of 10 Salisbury & Ryan, 1325 Avenue of 11 the Americas, New York, New York, 12 to take the videotaped deposition 13 of Ashot Egiазaryan, in the matter 14 of Ashot Egiазaryan versus Peter 15 Zalmayev. This is being heard in 16 the United States District Court, 17 Southern District of New York. 18 Will counsel please introduce 19 themselves for the record. 20 MR. GOLDEN: James Golden for 21 the defendant Peter Zalmayev. 22 MR. LUPKIN: Jonathan Lupkin 23 from the firm of Flemming Zulack 24 Williamson Zauderer, on behalf of 25 the witness and the plaintiff Ashot</p>	<p>1 ASHOT EGIАЗARYAN 2 VALERII M. SCHUKIN, 3 called as the interpreter in this 4 action, was sworn by the Notary 5 Public (Gail F. Schorr), to 6 accurately and faithfully 7 translate the questions 8 propounded to the witness from 9 English into Russian and the 10 answers given by the witness from 11 Russian into English. 12 IGOR VESLER, 13 called as the check interpreter 14 in this action, was sworn by the 15 Notary Public (Gail F. Schorr). 16 ASHOT EGIАЗARYAN, 17 called as a witness, having been 18 first duly sworn by the Notary 19 Public (Gail F. Schorr), was 20 examined and testified through 21 the interpreter as follows: 22 MR. LUPKIN: Before we begin, 23 Mr. Golden, if I can, I'd like to 24 put a few stipulations on the 25 record. First stipulation is that</p>

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1 ASHOT EGIAZARYAN
2 all objections except as to form
3 are reserved until the time of
4 trial. Is that acceptable?
5 MR. GOLDEN: Yes.
6 MR. LUPKIN: The parties waive
7 filing of the transcript?
8 MR. GOLDEN: Yes.
9 MR. LUPKIN: And the witness
10 may execute the transcript before
11 any officer authorized to
12 administer oaths, not necessarily
13 the one presiding over this
14 examination. Is that acceptable?
15 MR. GOLDEN: Yes.
16 MR. LUPKIN: Please continue.
17 EXAMINATION BY MR. GOLDEN:
18 **Q. Good morning, Mr. Egiazaryan.**
19 **My name is Jim Golden, I will be asking**
20 **you questions today. As you know, the**
21 **interpreter who is sitting to your right**
22 **is going to translate my questions and**
23 **your answers between English and Russian.**
24 **If after hearing the question in**
25 **translation you don't understand the**

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1 ASHOT EGIAZARYAN
2 **question, either because of what you**
3 **think is an uncertainty with the**
4 **translation or because of something about**
5 **the way that I ask the question, please**
6 **say that you don't understand and**
7 **together we will do what we can do to**
8 **make the question clearer.**
9 **If you want to take a break**
10 **for any reason, such as to talk to your**
11 **lawyers, to stretch your legs, or to go**
12 **to the bathroom, just say you would like**
13 **to take a break.**
14 MR. LUPKIN: Jim, I don't
15 believe you introduced your
16 colleagues on your side for the
17 purposes of the record.
18 MR. RYAN: He did.
19 MR. LUPKIN: You did? I
20 apologize.
21 **Q. Mr. Egiazaryan, would you**
22 **please describe what you consider to be**
23 **your ability to speak and understand**
24 **English?**
25 MR. LUPKIN: Objection to

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1 ASHOT EGIAZARYAN
2 form. You may answer.
3 A. I can understand English only
4 with the help of a dictionary and
5 communicate freely only with the help of
6 an interpreter.
7 **Q. Have you studied English?**
8 A. It was at my institute about
9 25, 30 years ago. After that, I don't
10 have any practice in English.
11 **Q. What is your estimate of how**
12 **much time you've spent visiting or living**
13 **in the United States?**
14 A. You mean the total time?
15 **Q. Yes.**
16 A. Well, the first time I visited
17 the United States was in 1991. My
18 visitations were not lengthy. The visit
19 was about six or seven days. After that,
20 my visitations were sometime once per
21 three or four years. The visits were of
22 the same length. I did not count what
23 was the total duration of my visits to
24 the United States in the nineties, but
25 generally speaking, totaling perhaps --

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1 ASHOT EGIAZARYAN
2 if we talk about the nineties, it was
3 probably 30, maybe 40 days totally.
4 If you take the year 2000 --
5 now if we take the year 2000, for
6 example, in the year 2000 it was my
7 business trip, I headed a delegation of
8 members of the Parliament to the US
9 Congress.
10 THE INTERPRETER: I'm sorry, I
11 have to verify one thing.
12 A. If we take the nineties, the
13 years nineties, the total would be like
14 half a year.
15 THE INTERPRETER: The
16 interpreter's remark: I verified
17 do you mean half a year or 30 or 40
18 days. So the witness said well
19 about half a year. I'm continuing
20 the witness's testimony.
21 A. And the 2000 business trips
22 would be a month, was a month to the US
23 Congress.
24 And after that, after that I
25 visited the United States maybe once

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<p>1 ASHOT EGIAZARYAN</p> <p>2 every year or two years, but those were</p> <p>3 mostly recreational trips. I would say</p> <p>4 about totaling maybe four months.</p> <p>5 Q. How long have you been in the</p> <p>6 United States on your current stay?</p> <p>7 A. Well, not including, not</p> <p>8 considering the latest time when I've</p> <p>9 been here lately --</p> <p>10 THE INTERPRETER: How long</p> <p>11 have you been this time, right?</p> <p>12 MR. GOLDEN: Yes.</p> <p>13 A. Currently, I've been here</p> <p>14 since September of 2010 up till today.</p> <p>15 Q. Do you read English language</p> <p>16 newspapers?</p> <p>17 A. No.</p> <p>18 Q. Do you watch English language</p> <p>19 television?</p> <p>20 A. No.</p> <p>21 Q. Do you know what I mean by the</p> <p>22 complaint in this case?</p> <p>23 A. Yes.</p> <p>24 Q. How did you communicate the</p> <p>25 facts of the complaint to your lawyers?</p>	<p>1 ASHOT EGIAZARYAN</p> <p>2 MR. LUPKIN: Objection to that</p> <p>3 question to form for the reasons</p> <p>4 that we discussed with the</p> <p>5 magistrate. Can you break it down,</p> <p>6 Mr. Golden?</p> <p>7 MR. GOLDEN: If he can answer</p> <p>8 the question, I want him to answer</p> <p>9 the question.</p> <p>10 A. Honestly, I do not understand</p> <p>11 the question.</p> <p>12 Q. What does the word reputation</p> <p>13 mean to you?</p> <p>14 A. Reputation is being informed</p> <p>15 about somebody or notoriety.</p> <p>16 Q. And what does the public think</p> <p>17 of you today?</p> <p>18 MR. LUPKIN: Objection; same</p> <p>19 objection, both location and</p> <p>20 subject matter.</p> <p>21 THE WITNESS: Shall I answer?</p> <p>22 MR. LUPKIN: You may answer,</p> <p>23 but note my objection.</p> <p>24 A. Can you please repeat the</p> <p>25 question.</p>
Page 11	Page 13
<p>1 ASHOT EGIAZARYAN</p> <p>2 MR. LUPKIN: Just one moment.</p> <p>3 I want to make sure that your</p> <p>4 answer answers Mr. Golden's</p> <p>5 question. Don't explain what it is</p> <p>6 that you said to your lawyers.</p> <p>7 A. I communicate that through a</p> <p>8 person who knows English and Russian.</p> <p>9 Q. Did you review the complaint</p> <p>10 and check it for accuracy?</p> <p>11 A. That complaint, again, in the</p> <p>12 words from the mouth of the interpreter,</p> <p>13 the translator, who translated it for me,</p> <p>14 and he told me verbally, orally about the</p> <p>15 complaint, and naturally, I approved of</p> <p>16 that. And naturally, I approved of that.</p> <p>17 Q. What do you think is your</p> <p>18 reputation today?</p> <p>19 MR. LUPKIN: Objection to</p> <p>20 form. May I have a location, and</p> <p>21 on what subject?</p> <p>22 MR. ZAUDERER: Translate that</p> <p>23 for him.</p> <p>24 Q. Everything and the whole</p> <p>25 world.</p>	<p>1 ASHOT EGIAZARYAN</p> <p>2 Q. What does the public think of</p> <p>3 you?</p> <p>4 MR. LUPKIN: Same objections.</p> <p>5 You may answer.</p> <p>6 A. I don't know what American</p> <p>7 public think of me. I don't know which</p> <p>8 public you mean, Japanese, Chinese. I</p> <p>9 don't know what the public in the</p> <p>10 Hawaiian islands think of me.</p> <p>11 Q. Do you know what any public</p> <p>12 thinks of you?</p> <p>13 MR. LUPKIN: Objection, same</p> <p>14 objection. You may answer over my</p> <p>15 objection.</p> <p>16 A. If you mean the Russian</p> <p>17 public, I think the public, well, some</p> <p>18 people may think one thing. Other people</p> <p>19 may think another thing, as many people</p> <p>20 could be as many opinions. For example,</p> <p>21 there was a case when I had a</p> <p>22 conversation with Putin. It was the year</p> <p>23 of 1999. I said, I was saying, well,</p> <p>24 there has been so many bad things written</p> <p>25 about you, how can you put your</p>

4 (Pages 10 to 13)

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<p style="text-align: right;">Page 14</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 candidature to be the president. There</p> <p>3 was an article in the newspaper Moscow</p> <p>4 Komsomolets. There was an article</p> <p>5 written about some children, about</p> <p>6 St. Petersburg, about the improper</p> <p>7 adoption of children.</p> <p>8 MR. VESLER: Larry, the word</p> <p>9 orphanage is missing, about</p> <p>10 orphanages, about orphans.</p> <p>11 A. Right, about orphanages, okay.</p> <p>12 And he said, well, I wouldn't care a fig</p> <p>13 about it and I was really, I was really</p> <p>14 surprised. So that's why, so what can I</p> <p>15 say about somebody thinking? Some people</p> <p>16 may entertain positive thoughts, some</p> <p>17 people may entertain other thoughts.</p> <p>18 Q. Did you read articles written</p> <p>19 about you in Russia?</p> <p>20 A. The articles that were written</p> <p>21 in Russia were mainly of, well, the</p> <p>22 origin that somebody had ordered them in</p> <p>23 view of the widespread campaign to</p> <p>24 discredit. That's why I've read some of</p> <p>25 them. Not all of them.</p>	<p style="text-align: right;">Page 16</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 MR. LUPKIN: Note my</p> <p>3 objection. You may answer.</p> <p>4 A. Yes. What articles do you</p> <p>5 mean?</p> <p>6 Q. Did you read articles about</p> <p>7 yourself before 2009?</p> <p>8 A. There were many articles</p> <p>9 published about me and there were also my</p> <p>10 comments to those articles that were</p> <p>11 published. Which articles are you</p> <p>12 talking about? If you tell me which</p> <p>13 articles I will comment on them.</p> <p>14 Q. Please estimate how many</p> <p>15 articles you read about yourself before</p> <p>16 2009?</p> <p>17 A. Well, naturally, I am not</p> <p>18 going -- I cannot say that. I just don't</p> <p>19 remember them.</p> <p>20 Q. Was it more than a hundred or</p> <p>21 less than a hundred?</p> <p>22 A. I cannot tell you it was more</p> <p>23 than a hundred or less than a hundred, I</p> <p>24 did not count them. I cannot tell you a</p> <p>25 lie.</p>
<p style="text-align: right;">Page 15</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 Q. Who ordered the articles to be</p> <p>3 written?</p> <p>4 MR. LUPKIN: Objection. I</p> <p>5 just caution the witness not to</p> <p>6 speculate.</p> <p>7 A. I was told who had ordered</p> <p>8 those articles. I was even told by the</p> <p>9 people who ordered them and who paid for</p> <p>10 those articles.</p> <p>11 Q. Who ordered the articles?</p> <p>12 A. Kerimov, K-e-r-i-m-o-v.</p> <p>13 MR. VESLER: K-e.</p> <p>14 Q. When did that start?</p> <p>15 A. Some of them started early in</p> <p>16 2009.</p> <p>17 Q. Did you read articles about</p> <p>18 yourself before 2009?</p> <p>19 A. Before 2009? Yes, I did.</p> <p>20 Q. And did those articles affect</p> <p>21 your reputation?</p> <p>22 MR. LUPKIN: Objection. Can</p> <p>23 you please clarify which articles.</p> <p>24 Q. The articles that were written</p> <p>25 before 2009?</p>	<p style="text-align: right;">Page 17</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 Q. Why did you write responses to</p> <p>3 some of the articles?</p> <p>4 MR. LUPKIN: Objection to</p> <p>5 form. You may answer.</p> <p>6 A. What articles? What</p> <p>7 responses? Tell me and I will comment on</p> <p>8 them.</p> <p>9 Q. Didn't you say a few minutes</p> <p>10 ago that you wrote responses or</p> <p>11 commentaries to some of the articles?</p> <p>12 A. I'm saying to what articles?</p> <p>13 I will be glad to comment on them, but</p> <p>14 tell me what comments?</p> <p>15 Q. I'm going to repeat the</p> <p>16 question. Didn't you say a few minutes</p> <p>17 ago that you wrote responses or</p> <p>18 commentaries to articles?</p> <p>19 MR. LUPKIN: Objection; asked</p> <p>20 and answered. You may answer</p> <p>21 again.</p> <p>22 A. I can respond in the following</p> <p>23 way. I'll be happy to comment, as I said</p> <p>24 a few minutes ago, any article about</p> <p>25 myself and any response that I gave to</p>

5 (Pages 14 to 17)

<p style="text-align: right;">Page 18</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 that article. I really do not understand</p> <p>3 what you're talking about. What article</p> <p>4 and what response are you talking about?</p> <p>5 Q. I'll repeat the question again</p> <p>6 because you still haven't answered it.</p> <p>7 Didn't you say a few minutes</p> <p>8 ago that you wrote responses or</p> <p>9 commentaries to articles that were</p> <p>10 written about you?</p> <p>11 A. Yes.</p> <p>12 Q. Why did you write those</p> <p>13 responses or commentaries?</p> <p>14 MR. LUPKIN: Wait a minute.</p> <p>15 Objection; asked and answered for</p> <p>16 the third time. I'm going to let</p> <p>17 him answer it one more time and</p> <p>18 then we'll move on.</p> <p>19 MR. GOLDEN: He hasn't</p> <p>20 answered that question and I</p> <p>21 haven't asked that question yet.</p> <p>22 MR. LUPKIN: I respectfully</p> <p>23 disagree, Mr. Golden, but please go</p> <p>24 ahead.</p> <p>25 Q. The question is why did you</p>	<p style="text-align: right;">Page 20</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 my education or my profession and the</p> <p>3 type of my work.</p> <p>4 Q. Before 2009, did you have a</p> <p>5 reputation for being honest?</p> <p>6 MR. LUPKIN: Objection; calls</p> <p>7 for speculation. You may answer.</p> <p>8 A. And I think that I still have</p> <p>9 it.</p> <p>10 Q. Before 2009, did you have a</p> <p>11 reputation for being corrupt?</p> <p>12 MR. LUPKIN: Objection; calls</p> <p>13 for speculation. You may answer.</p> <p>14 A. You mean corrupt person?</p> <p>15 Q. Yes.</p> <p>16 A. I don't understand the</p> <p>17 question. You mean that I'm -- what do</p> <p>18 you mean in your question by corrupted?</p> <p>19 I mean I am an official that took bribes</p> <p>20 you mean?</p> <p>21 Q. That's one example of</p> <p>22 corruption.</p> <p>23 A. What exactly do you mean?</p> <p>24 What example do you mean, I'll respond to</p> <p>25 you?</p>
<p style="text-align: right;">Page 19</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 write those responses or commentaries?</p> <p>3 MR. LUPKIN: Objection to</p> <p>4 form. You may answer.</p> <p>5 A. Because when you asked, when</p> <p>6 you asked the question you respond to</p> <p>7 that, or you may not respond to that</p> <p>8 question. In some cases I did respond,</p> <p>9 in some cases I did not respond. Have I</p> <p>10 satisfied you?</p> <p>11 Q. Can you describe why you</p> <p>12 respond to some articles and not to</p> <p>13 others?</p> <p>14 A. Yes, I can.</p> <p>15 Q. Please do that.</p> <p>16 A. Because some of the questions</p> <p>17 were significant, some of the questions</p> <p>18 were insignificant. I knew the topic of</p> <p>19 some of the questions. Some of the</p> <p>20 questions I did not know. If I did not</p> <p>21 know the question or did not know the</p> <p>22 subject of the question I do not -- I did</p> <p>23 not have to answer that question. Some</p> <p>24 of the questions, I don't remember which,</p> <p>25 some of the questions were not related to</p>	<p style="text-align: right;">Page 21</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 Q. What does the word corrupt</p> <p>3 mean?</p> <p>4 A. In my opinion, these officials</p> <p>5 when they take bribes and offer favors</p> <p>6 from, sort of from the government and</p> <p>7 they sell those favors, they sell, they</p> <p>8 sell services of the government and they</p> <p>9 gain profits by doing that.</p> <p>10 By the way, it could be on any</p> <p>11 level, starting with the lowest ranking</p> <p>12 official and ending with the highest</p> <p>13 ranking official.</p> <p>14 Q. Does corruption include</p> <p>15 stealing from --</p> <p>16 A. May I complete my answer? As</p> <p>17 far as I'm concerned, I did not accept</p> <p>18 bribes when I was on the governmental</p> <p>19 parliamentary level. That's why I cannot</p> <p>20 consider myself a corrupt person.</p> <p>21 Q. Does corruption include</p> <p>22 stealing from a company?</p> <p>23 MR. LUPKIN: Objection. Are</p> <p>24 you asking his opinion on that?</p> <p>25 MR. GOLDEN: Yes.</p>

6 (Pages 18 to 21)

<p style="text-align: right;">Page 22</p> <p>1 ASHOT EGIАЗARYAN</p> <p>2 MR. LUPKIN: You may answer.</p> <p>3 A. Stealing from a company?</p> <p>4 Q. Yes.</p> <p>5 A. Honestly, I do not quite</p> <p>6 understand the question. Which company,</p> <p>7 stealing from which company? If one</p> <p>8 company steals money from another</p> <p>9 company, I don't consider this</p> <p>10 corruption. It's just stealing, theft.</p> <p>11 Corruption is where the government</p> <p>12 participates.</p> <p>13 Q. Is it corruption if an</p> <p>14 employee of a company steals from that</p> <p>15 company?</p> <p>16 A. I think it is theft, it is</p> <p>17 stealing.</p> <p>18 Q. Before you said you think you</p> <p>19 have and had a reputation for honesty.</p> <p>20 What is the basis for that statement?</p> <p>21 A. The basis for what?</p> <p>22 Q. For your statement that you</p> <p>23 had a reputation for being honest?</p> <p>24 A. You mean the statement that I</p> <p>25 made now or the statement that I made</p>	<p style="text-align: right;">Page 24</p> <p>1 ASHOT EGIАЗARYAN</p> <p>2 material issue. That's off the</p> <p>3 record.</p> <p>4 A. I made it on the basis that</p> <p>5 personally I did not steal anything from</p> <p>6 anybody. That was the basis for that.</p> <p>7 Q. What do you think are the</p> <p>8 things that affect somebody's reputation?</p> <p>9 A. And honestly, what affects</p> <p>10 somebody's reputation is when a person is</p> <p>11 honest before himself, you know, for</p> <p>12 himself. When a person is confident</p> <p>13 inside himself that he makes correct</p> <p>14 decisions and acts correctly. And</p> <p>15 further, we build the understanding or an</p> <p>16 understanding has been built as related</p> <p>17 to the things that he does and the</p> <p>18 relation of the surrounding environment</p> <p>19 to them.</p> <p>20 Q. What do you mean by build an</p> <p>21 understanding and the relation to the</p> <p>22 surrounding environment?</p> <p>23 A. Surrounding environment, I'm</p> <p>24 not talking about nature, but it's the</p> <p>25 public, the society.</p>
<p style="text-align: right;">Page 23</p> <p>1 ASHOT EGIАЗARYAN</p> <p>2 against Zalmayev?</p> <p>3 Q. The statement that you made in</p> <p>4 the deposition today.</p> <p>5 (Interpreters confer).</p> <p>6 THE INTERPRETER: This is</p> <p>7 stylistical similar things. May I</p> <p>8 just say that it's easy to sit</p> <p>9 passively and watch somebody, you</p> <p>10 know, interpreting, you know.</p> <p>11 There may be some stylistic</p> <p>12 difficulties, but that's a</p> <p>13 difficult job that I'm doing, you</p> <p>14 know, please, you know.</p> <p>15 MR. LUPKIN: I think nobody's</p> <p>16 meaning to impugn anybody's</p> <p>17 qualifications or professionalism.</p> <p>18 We'll deal with it as it comes.</p> <p>19 Our interpreter is under</p> <p>20 instructions to identify what he</p> <p>21 perceives to be material issues and</p> <p>22 if there's a problem that can't be</p> <p>23 resolved Mr. Golden and I will</p> <p>24 resolve them.</p> <p>25 THE INTERPRETER: It's not a</p>	<p style="text-align: right;">Page 25</p> <p>1 ASHOT EGIАЗARYAN</p> <p>2 Q. Is reputation what the public</p> <p>3 thinks of you?</p> <p>4 A. Certainly.</p> <p>5 Q. And how does the public learn</p> <p>6 about you?</p> <p>7 MR. LUPKIN: Objection; calls</p> <p>8 for speculation. You may answer.</p> <p>9 A. You mean the public that</p> <p>10 learns, learns about me? Because before</p> <p>11 that you were asking questions, general</p> <p>12 questions about a person. You're talking</p> <p>13 about the public learning about a person</p> <p>14 or about me personally?</p> <p>15 Q. The public learning about a</p> <p>16 person generally?</p> <p>17 A. Well, some -- lately the</p> <p>18 public learns from the media, recently,</p> <p>19 especially as media develop further, you</p> <p>20 know, the internet, development of the</p> <p>21 internet. This is wide public.</p> <p>22 There is a narrower public</p> <p>23 that may learn about the activities of a</p> <p>24 person through rumors. This is a</p> <p>25 narrower notion.</p>

7 (Pages 22 to 25)

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Page 26	Page 28
<p>1 ASHOT EGIAZARYAN</p> <p>2 Q. Why did you retain the public</p> <p>3 relations firm BGR?</p> <p>4 MR. LUPKIN: Objection; lacks</p> <p>5 foundation. You may answer.</p> <p>6 A. The thing is that after my</p> <p>7 arrival in the US, there was a widespread</p> <p>8 campaign in the press, both in the</p> <p>9 Russian press, in the Russian press and</p> <p>10 in the American press, first it started</p> <p>11 with the Russian press, in order to</p> <p>12 discredit me. And in order to bring the</p> <p>13 realistic, the real information about</p> <p>14 what was happening, that particular PR</p> <p>15 company was retained.</p> <p>16 Q. When did the campaign start?</p> <p>17 A. You mean in Russia or in</p> <p>18 America?</p> <p>19 Q. In Russia.</p> <p>20 A. In Russia it began way back in</p> <p>21 2009.</p> <p>22 Q. When did it begin in America?</p> <p>23 A. It started in America in the</p> <p>24 late 2010 and in early 2011, yes.</p> <p>25 Approximately the end of 2010 and the</p>	<p>1 ASHOT EGIAZARYAN</p> <p>2 Q. Do you remember what the first</p> <p>3 article was about?</p> <p>4 A. They poured dirt on me.</p> <p>5 Q. What kind of dirt?</p> <p>6 A. Lies that they invented. I</p> <p>7 just don't remember the first, the second</p> <p>8 or the third, just lies that they wrote.</p> <p>9 I will be happy to comment on them if you</p> <p>10 tell me which one you are talking about.</p> <p>11 Q. When were you first a member</p> <p>12 of The Duma?</p> <p>13 A. It was in the year 2000.</p> <p>14 Q. How frequently are there</p> <p>15 elections for The Duma?</p> <p>16 A. Once every four years. Well,</p> <p>17 they -- well, they -- well, they -- that</p> <p>18 was in the past. Then the laws were</p> <p>19 changed. Now it's going to be every five</p> <p>20 years.</p> <p>21 Q. How many times were you</p> <p>22 elected or appointed to The Duma?</p> <p>23 A. You mean elected or appointed?</p> <p>24 What is your question? Because they</p> <p>25 elect into Duma.</p>
Page 27	Page 29
<p>1 ASHOT EGIAZARYAN</p> <p>2 beginning, this is approximately. I</p> <p>3 don't remember exactly, but at the</p> <p>4 beginning of 2011 plus/minus something.</p> <p>5 Q. When did you retain BGR?</p> <p>6 MR. LUPKIN: Objection; lacks</p> <p>7 foundation. You may answer.</p> <p>8 A. I retained the BGR company</p> <p>9 approximately at that time. Probably it</p> <p>10 was in the beginning of 2011.</p> <p>11 Q. Do you remember the first time</p> <p>12 that you learned about the campaign in</p> <p>13 the United States?</p> <p>14 A. I think yes, now I remember.</p> <p>15 About the beginning of the campaign, yes,</p> <p>16 I remember.</p> <p>17 Q. What was the first article</p> <p>18 that you saw?</p> <p>19 A. I don't remember what article</p> <p>20 was the first one. I just did not, I did</p> <p>21 not conduct a chronology.</p> <p>22 Q. Do you remember who wrote the</p> <p>23 first article?</p> <p>24 A. I just said I don't remember</p> <p>25 the chronology.</p>	<p>1 ASHOT EGIAZARYAN</p> <p>2 Q. How many times were you</p> <p>3 elected?</p> <p>4 A. Three.</p> <p>5 Q. Were you elected by people</p> <p>6 voting specifically for you?</p> <p>7 A. I can clarify the following,</p> <p>8 how elections are conducted. In the</p> <p>9 first Dumas, well, half of the 450</p> <p>10 members, that's 225, were elected</p> <p>11 according to the party lists and half</p> <p>12 were elected directly, personally.</p> <p>13 Q. Was that in just '99 or '99</p> <p>14 and 2003?</p> <p>15 A. Precisely it was in 1999.</p> <p>16 Q. And in 1999 were you elected</p> <p>17 directly or from the party list?</p> <p>18 A. I was elected according to the</p> <p>19 party list. I did not finish my</p> <p>20 response, I did not finish my explanation</p> <p>21 because you started talking.</p> <p>22 How is it done according to</p> <p>23 the party list? A party list is created,</p> <p>24 names are entered there and when, well,</p> <p>25 the electorate, when voters come to the</p>

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<p style="text-align: right;">Page 30</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 election place, naturally he reads that</p> <p>3 list with names and actually they vote</p> <p>4 not personally, they familiarize with the</p> <p>5 list, with the people in the list, and</p> <p>6 they vote for the list.</p> <p>7 Well these are also elections.</p> <p>8 The only difference, these are not</p> <p>9 personal elections, but elections by the</p> <p>10 list. They do the expression of their</p> <p>11 will in such a way. They know the names</p> <p>12 for whom they are voting.</p> <p>13 In other words, it's not done</p> <p>14 blindly. But now then it was removed.</p> <p>15 Now everybody votes by the lists.</p> <p>16 Honestly, my position I think</p> <p>17 that everything, all the voting should be</p> <p>18 personal.</p> <p>19 Q. In 1999 on what party's list</p> <p>20 were you?</p> <p>21 A. I was on the party list of</p> <p>22 Zhirinovsky's block.</p> <p>23 Q. What is the name of that</p> <p>24 party?</p> <p>25 MR. LUPKIN: Objection. Go</p>	<p style="text-align: right;">Page 32</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 A. A month ago.</p> <p>3 Q. Did you run for election a</p> <p>4 month ago?</p> <p>5 A. No. I was in America.</p> <p>6 Q. In 1999 or 2000 when you were</p> <p>7 first a member of The Duma, did members</p> <p>8 of The Duma have immunity from criminal</p> <p>9 prosecution?</p> <p>10 A. Formally, yes, but in reality,</p> <p>11 no.</p> <p>12 Q. Explain the difference between</p> <p>13 formally and in reality?</p> <p>14 A. With pleasure. Formally, that</p> <p>15 means what is written on paper, what is</p> <p>16 in the law, what the law says. Member of</p> <p>17 The Duma, a deputy possesses that</p> <p>18 immunity, but not absolute immunity.</p> <p>19 Criminal cases can be initiated against</p> <p>20 him, and he can be responsible for the</p> <p>21 criminal responsibility. All these</p> <p>22 procedures are in the laws of the status</p> <p>23 of the Parliament, of Duma. I am not</p> <p>24 relating it verbally as it is written</p> <p>25 there, but it has that name.</p>
<p style="text-align: right;">Page 31</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 ahead.</p> <p>3 A. LDP -- LDPR.</p> <p>4 Q. What does LDPR stand for?</p> <p>5 A. Liberal Democratic Party of</p> <p>6 Russia.</p> <p>7 Q. In 1999 am I right that you</p> <p>8 said that Zhirinovsky was the head of</p> <p>9 that party?</p> <p>10 A. Well, I did not say that, but</p> <p>11 it is really so.</p> <p>12 Q. In 2003 on what party list</p> <p>13 were you?</p> <p>14 A. LDPR.</p> <p>15 Q. In 2003, was Zhirinovsky still</p> <p>16 the head of the party?</p> <p>17 A. Absolutely correct.</p> <p>18 Q. In 2007 on what party's list</p> <p>19 were you?</p> <p>20 A. The same.</p> <p>21 Q. And was Zhirinovsky still the</p> <p>22 head of the party?</p> <p>23 A. Yes.</p> <p>24 Q. After 2007, when was the next</p> <p>25 election?</p>	<p style="text-align: right;">Page 33</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 But the specifics of these</p> <p>3 situations are that if in a corrupt</p> <p>4 state, country, courts and law</p> <p>5 enforcement agencies are not carrying out</p> <p>6 their functions, it is one of those laws</p> <p>7 that simply do not work, because in</p> <p>8 reality, in my opinion, it is one of the</p> <p>9 nonworking laws, just like all of them,</p> <p>10 all the others.</p> <p>11 Q. When did you learn that the</p> <p>12 immunity did not work in reality?</p> <p>13 A. I read what -- that was a</p> <p>14 gradual procedure. Honestly, I've never</p> <p>15 focused my attention whether immunity</p> <p>16 works or does not work. Generally, laws</p> <p>17 in that country do not work. I began</p> <p>18 having doubts sometime after 2003 and</p> <p>19 that, those doubts were getting stronger</p> <p>20 and stronger.</p> <p>21 Well, it is in general</p> <p>22 principally, in principle that it is</p> <p>23 understandable to anybody who is living</p> <p>24 in, or the whole population that is</p> <p>25 living in Russia.</p>

9 (Pages 30 to 33)

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<p>1 ASHOT EGIAZARYAN</p> <p>2 Q. When you started to have</p> <p>3 doubts, did you give any speeches that</p> <p>4 explained your doubts?</p> <p>5 A. No, I did not, with the</p> <p>6 exception of some episodes, with some</p> <p>7 cases of comments to some reporters,</p> <p>8 single cases of comments.</p> <p>9 Q. When you started to have</p> <p>10 doubts about the laws, did you write any</p> <p>11 articles expressing your doubts?</p> <p>12 MR. LUPKIN: Point of</p> <p>13 clarification. Are you asking him</p> <p>14 about the laws generally or about</p> <p>15 the immunity laws specifically?</p> <p>16 MR. GOLDEN: The laws</p> <p>17 generally, because that's my</p> <p>18 understanding of what he was</p> <p>19 talking about.</p> <p>20 MR. LUPKIN: Okay.</p> <p>21 A. No. There were some single</p> <p>22 cases when they called me, reporters</p> <p>23 called me, came to see me, asked</p> <p>24 questions.</p> <p>25 Q. In 2011, did you write any</p>	<p>1 ASHOT EGIAZARYAN</p> <p>2 voted when one person decides that, makes</p> <p>3 that decision.</p> <p>4 Q. Who's the one person?</p> <p>5 A. Putin.</p> <p>6 Q. Before the December 2011</p> <p>7 elections, were there four parties in The</p> <p>8 Duma?</p> <p>9 A. I'll tell you now. It was --</p> <p>10 it was -- it was a pseudo party, pseudo</p> <p>11 party, pseudo party, United Russia.</p> <p>12 Those were the Communists. It was the</p> <p>13 LDPR. And some other party. I don't</p> <p>14 remember.</p> <p>15 Q. When you say the pseudo party,</p> <p>16 were you referring to United Russia?</p> <p>17 A. Yes.</p> <p>18 Q. In the vote to eliminate --</p> <p>19 A. In principle, when I talk</p> <p>20 about pseudo parties, all the parties</p> <p>21 that are represented in Duma, they're all</p> <p>22 pseudo parties.</p> <p>23 Q. In the vote to eliminate your</p> <p>24 immunity, did the LDPR members vote</p> <p>25 against eliminating your immunity?</p>
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<p>1 ASHOT EGIAZARYAN</p> <p>2 articles expressing your doubts or</p> <p>3 objection to the system of laws?</p> <p>4 A. I did.</p> <p>5 Q. Do you remember approximately</p> <p>6 how many times?</p> <p>7 A. Several times.</p> <p>8 Q. Was there a time when your</p> <p>9 immunity was eliminated by The Duma?</p> <p>10 A. Yes.</p> <p>11 Q. When was that?</p> <p>12 A. It was at the end of 2010. I</p> <p>13 don't remember exactly when.</p> <p>14 Q. Do you remember approximately</p> <p>15 what the vote in The Duma was to</p> <p>16 eliminate your immunity?</p> <p>17 A. The government parties voted</p> <p>18 for that. I don't remember the exact</p> <p>19 number. That's not really important</p> <p>20 because, that doesn't matter much because</p> <p>21 all the laws that are approved at Duma</p> <p>22 are approved by the orders from the</p> <p>23 Kremlin. One person accepts that, one</p> <p>24 person approves that. That's why in</p> <p>25 Russia it's irrelevant how many people</p>	<p>1 ASHOT EGIAZARYAN</p> <p>2 A. Yes.</p> <p>3 Q. Did anybody else vote against</p> <p>4 eliminating your immunity?</p> <p>5 A. There were more votes, there</p> <p>6 were more votes than the members of the</p> <p>7 LDPR, but I cannot tell you how many.</p> <p>8 Maybe somebody was told to vote against</p> <p>9 in order to give the air, or give the</p> <p>10 impression of Democrat -- democracy, I'm</p> <p>11 sure of that.</p> <p>12 Q. In Russia, have you been</p> <p>13 charged with a crime?</p> <p>14 A. Well, precisely that was the</p> <p>15 reason why they were removing the</p> <p>16 immunity according to the fabricated</p> <p>17 cases.</p> <p>18 Q. Does that mean yes, you were</p> <p>19 charged with a crime?</p> <p>20 A. There was no trial. I would</p> <p>21 like to -- I would like to understand</p> <p>22 your notions, you know, what do you mean</p> <p>23 by were there charges, specifically I was</p> <p>24 charged?</p> <p>25 Q. Yes.</p>

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<p>1 ASHOT EGIAZARYAN</p> <p>2 A. Yes, the charges were.</p> <p>3 Q. When were you charged with a</p> <p>4 crime?</p> <p>5 A. The charges began, actually,</p> <p>6 the campaign of charges, this campaign</p> <p>7 started in 2009 when they started</p> <p>8 liquidating my property on the part of</p> <p>9 Kerimov, K-i-r-i-m-O-v, Putin, and</p> <p>10 Rotenberg. Let me give you Kerimov</p> <p>11 again, K-i-r-i-m-o-v, Putin and</p> <p>12 Rotenberg, the Rotenberg brothers.</p> <p>13 Q. Did you come to the United</p> <p>14 States because you were --</p> <p>15 A. I did not finish.</p> <p>16 Q. Oh, I'm sorry.</p> <p>17 A. Okay, but you can go on.</p> <p>18 Q. No, you should finish.</p> <p>19 THE INTERPRETER: Those are</p> <p>20 his words.</p> <p>21 Q. Oh, you should finish.</p> <p>22 A. It started in 2009, as I said.</p> <p>23 It was a criminal case that was</p> <p>24 fabricated, according to which people</p> <p>25 close to me initially were charged. I'm</p>	<p>1 ASHOT EGIAZARYAN</p> <p>2 is?</p> <p>3 MR. LUPKIN: I'll explain the</p> <p>4 reason when Mr. Muranov leaves the</p> <p>5 room.</p> <p>6 MR. GOLDEN: Would you excuse</p> <p>7 us for a few minutes.</p> <p>8 MR. LUPKIN: No disrespect,</p> <p>9 Mr. Muranov.</p> <p>10 (At this time, Mr. Muranov</p> <p>11 left the deposition room).</p> <p>12 (The following testimony was</p> <p>13 designated confidential, attorneys'</p> <p>14 eyes only:)</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
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<p>1 ASHOT EGIAZARYAN</p> <p>2 going to give you a brief description now</p> <p>3 so that we do not waste time, but if you</p> <p>4 have questions you can ask them later on.</p> <p>5 There was a criminal case that</p> <p>6 was fabricated. Under the pressure my</p> <p>7 property was taken away from me. Then</p> <p>8 after my property was seized, that case</p> <p>9 was stopped, actually closed. Well after</p> <p>10 I went to the courts, to the British</p> <p>11 court, that case was reopened again and</p> <p>12 the charges were made against me and my</p> <p>13 close people.</p> <p>14 This is my response to your</p> <p>15 question about the charges against me.</p> <p>16 Q. What property was taken?</p> <p>17 A. The Hotel Moskva, M-o-s-k-v-a.</p> <p>18 Q. How was the Hotel Moscow taken</p> <p>19 from you as part of your being charged</p> <p>20 with a crime?</p> <p>21 MR. LUPKIN: Let's please --</p> <p>22 please translate and then -- Jim,</p> <p>23 at this juncture I'd like to ask</p> <p>24 Mr. Muranov to leave the room.</p> <p>25 MR. GOLDEN: And the reason</p>	<p>1 ASHOT EGIAZARYAN</p> <p>2 (A recess was taken.)</p> <p>3 (At this time, Mr. Muranov</p> <p>4 returned to the deposition room.)</p> <p>5 THE VIDEOGRAPHER: The time is</p> <p>6 11:39 a.m., we're back on the</p> <p>7 record.</p> <p>8 MR. GOLDEN: The topic that</p> <p>9 you raised, Jon, I will treat as</p> <p>10 attorneys' eyes only and I will</p> <p>11 group it with my questioning about</p> <p>12 asylum for everybody's ease.</p> <p>13 MR. LUPKIN: Thank you very</p> <p>14 much, Mr. Golden. Also, before we</p> <p>15 continue the questioning, I also</p> <p>16 want to confirm that other than the</p> <p>17 recording that's being made, the</p> <p>18 video and audio recording that's</p> <p>19 being made and the stenographic</p> <p>20 recording, that nobody else is</p> <p>21 recording in any way the</p> <p>22 proceedings here today.</p> <p>23 MR. GOLDEN: Well the CIA has</p> <p>24 a bug in the light, other than</p> <p>25 that, nobody else is recording.</p>

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<p style="text-align: right;">Page 48</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 MR. LUPKIN: I just wanted to</p> <p>3 confirm that. Please continue.</p> <p>4 Q. Mr. Egiazaryan, what does the</p> <p>5 term Russian oligarch mean to you?</p> <p>6 A. Well, it is a rich man. Well,</p> <p>7 the attitude, the public attitude is not</p> <p>8 well defined to these notions the way I</p> <p>9 understand it. And based on that, also</p> <p>10 my understanding of this issue is formed.</p> <p>11 On one hand, if we understand</p> <p>12 an oligarch as a rich man, that's nice,</p> <p>13 we're not going to take the classic</p> <p>14 interpretation like the merger of</p> <p>15 finances and industrial capital because</p> <p>16 it's going to take a long time, although</p> <p>17 if you wish, I can go deeper in that.</p> <p>18 In my understanding, it's nice</p> <p>19 when a man has a large quantity of money</p> <p>20 that he has earned himself. On the other</p> <p>21 hand, if he has stolen some enterprises</p> <p>22 and became one of the richest people, it</p> <p>23 is bad and it's not acceptable.</p> <p>24 Unfortunately, in the Russian</p> <p>25 society, mainly the notion of an oligarch</p>	<p style="text-align: right;">Page 50</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 way?</p> <p>3 A. Well, I did not say that. I</p> <p>4 said that wealth could be obtained either</p> <p>5 through honest means or dishonest means,</p> <p>6 but unfortunately, many of them have</p> <p>7 received through a dishonest way</p> <p>8 according to the opinions of the media,</p> <p>9 of the information in the press. The</p> <p>10 wealthiest people are being criticized</p> <p>11 for the dishonest methods of obtaining</p> <p>12 their wealth.</p> <p>13 Q. So is a Russian, to you, is a</p> <p>14 Russian oligarch somebody who is very</p> <p>15 wealthy and some of them obtained their</p> <p>16 money honestly and some dishonestly?</p> <p>17 A. Yes.</p> <p>18 Q. Are you a Russian oligarch?</p> <p>19 A. I don't think so.</p> <p>20 Q. Were you ever a Russian</p> <p>21 oligarch?</p> <p>22 A. No.</p> <p>23 Q. Is Mr. Kerimov a Russian</p> <p>24 oligarch?</p> <p>25 A. Mr. Kerimov loves the word</p>
<p style="text-align: right;">Page 49</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 is about people who dishonestly obtained</p> <p>3 their fortune either through getting</p> <p>4 ownership of large enterprises or later</p> <p>5 on, this is already in the years of 2000</p> <p>6 this was a new, it was a new generation</p> <p>7 of oligarchs. When I say a new</p> <p>8 generation, I don't mean young, they were</p> <p>9 not young by their age.</p> <p>10 That made, the people that</p> <p>11 made billions, well earned billions, well</p> <p>12 I would rather say earned is not the</p> <p>13 proper, the proper word here. Well I</p> <p>14 would say obtained billions through a</p> <p>15 dishonest method. And that is why in our</p> <p>16 Russian society the main portion of</p> <p>17 people, of oligarchs, in my opinion, the</p> <p>18 attitude towards them is negative.</p> <p>19 Practically, their capitals were stolen</p> <p>20 from people.</p> <p>21 That is why it is natural that</p> <p>22 people don't like them.</p> <p>23 Q. So to you the term Russian</p> <p>24 oligarch means somebody who's rich, who</p> <p>25 has obtained his wealth in a dishonest</p>	<p style="text-align: right;">Page 51</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 oligarch. Probably he considers himself</p> <p>3 a Russian oligarch. A Russian oligarch.</p> <p>4 Q. Do you consider him a Russian</p> <p>5 oligarch?</p> <p>6 A. Well, I cannot give you a one</p> <p>7 syllable answer to this question. I have</p> <p>8 to give it a thought, I have to -- I have</p> <p>9 to weigh it and I can explain to you why.</p> <p>10 Q. Please explain.</p> <p>11 A. Well, again, we have to go</p> <p>12 back to what I had said before regarding</p> <p>13 the honest ways or dishonest ways of</p> <p>14 obtaining the capital. In my subjective</p> <p>15 understanding I think that the capital</p> <p>16 and the finances that were obtained by</p> <p>17 him were not obtained in an honest way</p> <p>18 judging by the publications in the press</p> <p>19 and my personal contacts with him.</p> <p>20 That's why I have to analyze</p> <p>21 it and form my determination.</p> <p>22 Q. Why is -- why are the</p> <p>23 publications in the press about Kerimov</p> <p>24 important?</p> <p>25 A. What?</p>

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1 ASHOT EGIAZARYAN
 2 MR. GOLDEN: Would the
 3 reporter read back his answer and
 4 in particular the phrase
 5 publications in the press.
 6 (Record read as requested.)
 7 A. I said, I said according to
 8 the publications in the press and my
 9 personal contacts with him.
 10 Q. Yes. And what did you learn
 11 from the publications in the press?
 12 A. There was a lot of
 13 publications in the press. I can make
 14 comments on some of them when I have them
 15 in front of me.
 16 Q. Did some --
 17 A. The main mass of those
 18 publications were in relation to raids
 19 and the seizure of properties, raids to
 20 seize the properties. I cannot consider
 21 them as honest methods of earning money.
 22 Q. If you said before that an
 23 oligarch, a Russian oligarch is somebody
 24 who's very wealthy, who got his money
 25 either by honest or dishonest means, why

1 ASHOT EGIAZARYAN
 2 does it matter to you whether Mr. Kerimov
 3 got his money dishonestly, in answering
 4 the question whether he is a Russian
 5 oligarch?
 6 A. Once again. What is the
 7 point?
 8 Q. I'll go on. Is Mr.
 9 Zhirinovskiy a Russian oligarch?
 10 A. I don't think so.
 11 Q. Do you know who Aleksey
 12 Mitrofanov is?
 13 A. Aleksey Mitrofanov used to be
 14 a member of the Russian Duma if we're
 15 talking about that Aleksey Mitrofanov.
 16 Q. Is he a Russian oligarch?
 17 A. I don't -- I'm not aware of
 18 the property that he has, that's why I
 19 cannot give a notion in my opinion of
 20 what he possesses. I simply don't know
 21 what he possesses. Maybe he does possess
 22 some enterprises and some financial
 23 assets, maybe he doesn't. I have not
 24 heard of his assets.
 25 Based on that, I may err here,

1 ASHOT EGIAZARYAN
 2 I may err, I may make a mistake here, but
 3 rather I would say I don't know.
 4 Q. Is Mikhail Fridman a Russian
 5 oligarch?
 6 A. Mikhail Fridman no doubt is a
 7 Russian oligarch.
 8 Q. Is Vitali Smagin a Russian
 9 oligarch?
 10 A. I don't know what properties
 11 Vitali Smagin possesses right now. Maybe
 12 during recent times he was engaged in
 13 business. Maybe he did become one.
 14 Maybe one has to make a determination as
 15 to the sum, the amount of money according
 16 to which this or that person falls under
 17 the category of an oligarch.
 18 Well, in Russia we have our
 19 own lists of wealthy people like the
 20 Forbes or the finance magazine that they
 21 publish lists of well-to-do people.
 22 Maybe the first 100 names of Russian
 23 lists could fall under the category of
 24 oligarchs. One has to take up those
 25 lists and see who is included or who's

1 ASHOT EGIAZARYAN
 2 not included. Myself, I similarly have
 3 not learned them.
 4 Q. Are you involved in litigation
 5 now with Mr. Kerimov?
 6 A. Yes.
 7 Q. Are you involved in litigation
 8 now with Mr. Fridman?
 9 A. Against Fridman?
 10 Q. Or his companies, yes?
 11 A. No.
 12 Q. Did you just file within the
 13 last month or two a lawsuit in Cyprus
 14 against Mr. Fridman or his companies?
 15 A. No.
 16 Q. Did any company that you own
 17 file a lawsuit against Mr. Fridman or his
 18 companies?
 19 A. No.
 20 Q. I'm going to ask you some
 21 questions about the complaint. Would you
 22 like to see a copy of it while I ask the
 23 questions?
 24 A. Probably, yes.
 25 MR. LUPKIN: I'm going to give

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<p>1 ASHOT EGIAZARYAN</p> <p>2 it to you. Actually --</p> <p>3 MR. GOLDEN: In the book over</p> <p>4 there Exhibit 29 has a copy of the</p> <p>5 complaint.</p> <p>6 MR. LUPKIN: Fair enough.</p> <p>7 Excuse me, could we go off the</p> <p>8 record for just one second?</p> <p>9 THE VIDEOGRAPHER: The time is</p> <p>10 11:58 a.m., we're off the record.</p> <p>11 (Discussion off the record.)</p> <p>12 THE VIDEOGRAPHER: This will</p> <p>13 end tape 1 in the deposition of</p> <p>14 Ashot Egiazaryan. The time is</p> <p>15 11:59, we're off the record.</p> <p>16 (A recess was taken.)</p> <p>17 THE VIDEOGRAPHER: This is the</p> <p>18 start of tape 2 in the deposition</p> <p>19 of Ashot Egiazaryan. The time is</p> <p>20 12:05 p.m., we're on the record.</p> <p>21 Q. Mr. Egiazaryan, who is Artem</p> <p>22 Egiazaryan?</p> <p>23 A. My brother.</p> <p>24 Q. Are you in any businesses with</p> <p>25 him?</p>	<p>1 ASHOT EGIAZARYAN</p> <p>2 beneficiary is myself.</p> <p>3 Q. If you're the main</p> <p>4 beneficiary, who owns it today? <i>Gogokhiya</i></p> <p>5 A. It was registered as <i>Gagohia</i>,</p> <p>6 G-a-g-o-h-i-a.</p> <p>7 Q. What does that mean?</p> <p>8 A. It's a name. <i>Gogokhiya</i></p> <p>9 Q. So Gagohia owns Blindensoe? <i>Blidensol</i></p> <p>10 A. No, you asked who was it</p> <p>11 registered to. <i>Gogokhiya</i></p> <p>12 Q. Is Gagohia a person?</p> <p>13 A. A person.</p> <p>14 Q. What is that person's full</p> <p>15 name?</p> <p>16 A. Vitali.</p> <p>17 THE INTERPRETER: V-i-t-a-l-i.</p> <p>18 Q. Do you own Heckam? <i>Hackham</i></p> <p>19 <i>Blidensol</i> Yes. As I said, Heckam, <i>Hackham</i></p> <p>20 Blindensoe, Longlake, these are my</p> <p>21 companies.</p> <p>22 Q. And the other ones that you</p> <p>23 couldn't remember involved in the</p> <p>24 lawsuits, are they your companies too?</p> <p>25 MR. LUPKIN: Objection to</p>
Page 57	Page 59
<p>1 ASHOT EGIAZARYAN</p> <p>2 A. Yes.</p> <p>3 Q. What businesses are you</p> <p>4 involved in with him?</p> <p>5 A. My main business with him was</p> <p>6 and still is regarding the lawsuits</p> <p>7 involving the Hotel Moskva.</p> <p>8 Q. In the lawsuits that you just</p> <p>9 described, are some of the parties</p> <p>10 companies?</p> <p>11 A. Yes.</p> <p>12 Q. What are the names of the</p> <p>13 companies? <i>Blidensol</i>, <i>Hackham</i></p> <p>14 A. Blindensoe, Heckam, Longlake,</p> <p>15 Longlake. There may be some other</p> <p>16 companies, but these are as far as I</p> <p>17 remember the main companies. <i>Blidensol</i></p> <p>18 Q. Do you own Blindensoe?</p> <p>19 A. As the final beneficiary, yes.</p> <p>20 Q. Does Artem own any of</p> <p>21 Blindensoe? <i>Blidensol</i></p> <p>22 A. I cannot say that because I</p> <p>23 don't know. I don't think so. I don't</p> <p>24 know in detail how it was documented,</p> <p>25 what the documents say, but the main</p>	<p>1 ASHOT EGIAZARYAN</p> <p>2 form. You may answer. <i>Blidensol</i></p> <p>3 A. What other?</p> <p>4 Q. When I asked who the parties</p> <p>5 were in the lawsuits over the Hotel <i>Hackham</i></p> <p>6 Moscow you said Blindensoe, Heckam,</p> <p>7 Longlake and a few others that you</p> <p>8 weren't sure of?</p> <p>9 A. There may be others. I do not</p> <p>10 exclude that, I just don't remember the</p> <p>11 names. These are the main companies.</p> <p>12 Q. Does Artem own any of Heckam?</p> <p>13 A. No, I don't have such <i>Hackham</i></p> <p>14 information.</p> <p>15 Q. Does Artem own any of</p> <p>16 Longlake?</p> <p>17 MR. LUPKIN: We have to get a</p> <p>18 verbal response, I think.</p> <p>19 A. Yes. No, he does not.</p> <p>20 Q. Who is Suren Egiazaryan?</p> <p>21 A. This is my cousin.</p> <p>22 Q. Are you in business with</p> <p>23 Suren?</p> <p>24 A. Yes, Suren is a member of my</p> <p>25 family, or I'm a member of his family.</p>

14 (Pages 56 to 59)

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<p style="text-align: right;">Page 60</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 We are, we're members of, we're one</p> <p>3 family.</p> <p>4 Q. Do you do business with Suren?</p> <p>5 A. I have one business now. I am</p> <p>6 handling the litigation in London and at</p> <p>7 this stage I am not engaged in other</p> <p>8 businesses.</p> <p>9 Q. Before you were involved in</p> <p>10 only the litigation in London, was, were</p> <p>11 you in business with Suren?</p> <p>12 A. Yes, I was.</p> <p>13 Q. What businesses were you</p> <p>14 involved in with him?</p> <p>15 A. That was the business of the</p> <p>16 Northern Oil, company Northern Oil.</p> <p>17 Q. Were you involved in any other</p> <p>18 businesses with Suren?</p> <p>19 A. There were other businesses.</p> <p>20 I'm talking about main businesses.</p> <p>21 Q. Was Artem involved with the</p> <p>22 Northern Oil business too?</p> <p>23 A. As far as I know, no, he was</p> <p>24 not.</p> <p>25 Q. Have Artem or Suren recently,</p>	<p style="text-align: right;">Page 62</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 for defamation."</p> <p>3 A. Can you show me where is this?</p> <p>4 Q. It's paragraph 1, the first</p> <p>5 line.</p> <p>6 A. Because this is in English.</p> <p>7 Do you mind if I read it?</p> <p>8 Q. No, please do.</p> <p>9 What is your understanding of</p> <p>10 what defamation is?</p> <p>11 MR. LUPKIN: Objection. It</p> <p>12 calls for a legal conclusion. I'll</p> <p>13 permit him to answer based on his</p> <p>14 understanding.</p> <p>15 A. Defamation in my view is lies.</p> <p>16 I may err, of course.</p> <p>17 Q. I'm going to ask you questions</p> <p>18 about paragraph 2, which is on page 2.</p> <p>19 You said that Mr. Zalmayev communicated</p> <p>20 defamatory statements and then you list</p> <p>21 six of them.</p> <p>22 MR. LUPKIN: Excuse me, where</p> <p>23 is --</p> <p>24 THE INTERPRETER: No, it's</p> <p>25 something different here.</p>
<p style="text-align: right;">Page 61</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 in the last few months, filed a lawsuit</p> <p>3 against Mikhail Fridman?</p> <p>4 MR. LUPKIN: Objection to</p> <p>5 form; compound. You can answer the</p> <p>6 question.</p> <p>7 THE INTERPRETER: He's asking</p> <p>8 me to repeat the translation.</p> <p>9 A. I just don't know. What was</p> <p>10 the question, Artem or Suren, or Artem</p> <p>11 and Suren?</p> <p>12 Q. In the last few months, has</p> <p>13 either together or separately Artem or</p> <p>14 Suren filed a lawsuit against Mikhail</p> <p>15 Fridman or any of his businesses?</p> <p>16 A. I'm not aware of. I don't</p> <p>17 know if they participate jointly or</p> <p>18 separately in that business, well judging</p> <p>19 by your question, I don't know if they</p> <p>20 participate in that in view of the fact</p> <p>21 that as I said, I'm handling only what</p> <p>22 I've just mentioned and I'm not involved</p> <p>23 in any other businesses.</p> <p>24 Q. In the complaint on page 1,</p> <p>25 paragraph 1, you say "This is an action</p>	<p style="text-align: right;">Page 63</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 MR. LUPKIN: Can we just</p> <p>3 establish where you're reading</p> <p>4 from, Jim?</p> <p>5 MR. GOLDEN: I'm sorry,</p> <p>6 paragraph 2.</p> <p>7 MR. LUPKIN: Where?</p> <p>8 MR. GOLDEN: I was summarizing</p> <p>9 the first sentence, actually the</p> <p>10 second sentence.</p> <p>11 MR. LUPKIN: Okay.</p> <p>12 A. May I read the second</p> <p>13 sentence?</p> <p>14 MR. GOLDEN: Yes, why don't</p> <p>15 you read all of paragraph 2 to him.</p> <p>16 Q. Is the LDPR anti-Semitic?</p> <p>17 A. Several statements of</p> <p>18 Zhirinovsky that he pronounced, that he</p> <p>19 verbalized of which I myself learned <i>indicate that he</i></p> <p>20 quite recently testify to that fact. <i>has made anti-</i></p> <p>21 the same time, anti-Semitic statements, <i>Semitic</i></p> <p>22 which I myself, I consider unacceptable, <i>unacceptable</i> admissible, <i>statements</i></p> <p>23 are made by many Russian politicians that</p> <p>24 are practically in all the factions of</p> <p>25 the state Duma.</p>

15 (Pages 60 to 63)

<p style="text-align: right;">Page 64</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 As far as Zhirinovsky is</p> <p>3 concerned, I cannot give a personal</p> <p>4 evaluation of him because naturally,</p> <p>5 neither he nor myself never coordinate</p> <p>6 our actions. On my part I can</p> <p>7 categorically emphasize my rejection,</p> <p>8 disagreement with any anti-Semitic</p> <p>9 phenomena in whichever way that's</p> <p>10 expressed.</p> <p>11 Q. When did you learn that</p> <p>12 Vladimir Zhirinovsky made anti-Semitic</p> <p>13 pronouncements?</p> <p>14 A. I learned about them perhaps,</p> <p>15 well, during last two years. That is</p> <p>16 explained by the fact that I never took</p> <p>17 part in Zhirinovsky's conferences, party</p> <p>18 assemblies, his public speeches, his</p> <p>19 street pronouncements, where various</p> <p>20 opinions of his could be verbalized</p> <p>21 opinions and positions could be</p> <p>22 pronounced, and not only on this issue,</p> <p>23 but also on all the other issues.</p> <p>24 Q. When did you learn what the</p> <p>25 policies of the LDPR were?</p>	<p style="text-align: right;">Page 66</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 opinion I can characterize only in one</p> <p>3 way, is to achieve popularity at this</p> <p>4 time irrespective of his methods. Well I</p> <p>5 mean not criminal methods. I don't mean</p> <p>6 like murders.</p> <p>7 Q. Mr. Egiazaryan, what did Mr.</p> <p>8 Zhirinovsky do to achieve popularity</p> <p>9 between 1999 and 2003, your first and</p> <p>10 second elections to The Duma?</p> <p>11 A. I have to say that the bulk of</p> <p>12 his popularity of Mr. Zhirinovsky is at</p> <p>13 the beginning of the nineties. That was</p> <p>14 based on the fact that the people were</p> <p>15 sick and tired of the Soviet Union.</p> <p>16 People just wanted something different.</p> <p>17 But people did not understand politics</p> <p>18 very much, did not understand, did not</p> <p>19 know enough about political parties,</p> <p>20 because they didn't exist. It was</p> <p>21 difficult to understand them. Well, on</p> <p>22 that wave, Zhirinovsky did show up. As</p> <p>23 regards your specific question about the</p> <p>24 year 2000 and beginning of 2000.</p> <p>25 As far as I can remember, by</p>
<p style="text-align: right;">Page 65</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 MR. LUPKIN: Objection.</p> <p>3 Excuse me, objection to form. When</p> <p>4 you say policies, you mean formal</p> <p>5 policies? What do you mean, Jim?</p> <p>6 Q. Mr. Egiazaryan, to you, what</p> <p>7 does the phrase policies of a political</p> <p>8 party mean?</p> <p>9 A. This is the main ideological</p> <p>10 line that a party is conducting. As for</p> <p>11 Zhirinovsky, I don't think he has a firm,</p> <p>12 definite, specific political line. The</p> <p>13 LDPR is a specific party. Mainly it is</p> <p>14 the party of one man. Whether it is good</p> <p>15 or bad, but it is a fact, it exists.</p> <p>16 Q. You said it's the party of one</p> <p>17 man. Is that Zhirinovsky?</p> <p>18 A. Yes.</p> <p>19 Q. When did you learn what the</p> <p>20 LDPR policies were?</p> <p>21 A. Honestly, up till now I don't</p> <p>22 know what the policies are.</p> <p>23 Q. When did you learn what the</p> <p>24 policies of Zhirinovsky were?</p> <p>25 A. Zhirinovsky's policy in my</p>	<p style="text-align: right;">Page 67</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 that time, Zhirinovsky's popularity, yes,</p> <p>3 he did retain a certain percentage of the</p> <p>4 electorate, but that popularity was on</p> <p>5 the decrease.</p> <p>6 Which, what slogans he</p> <p>7 proclaimed at that time I cannot say, I</p> <p>8 never paid attention to them.</p> <p>9 Q. What policies or statements</p> <p>10 did Zhirinovsky advance before 1999 to</p> <p>11 achieve popularity?</p> <p>12 A. Those were statements like</p> <p>13 from each man we must get a bottle of</p> <p>14 vodka and each woman should get a man.</p> <p>15 Well maybe it was the basic, the main</p> <p>16 thing that everybody remembered. If we</p> <p>17 talk about that we can ask any Russian</p> <p>18 person what was Zhirinovsky's political</p> <p>19 credo. Apart from that, I don't think</p> <p>20 that people would remember anything else,</p> <p>21 including myself.</p> <p>22 Though at the same time,</p> <p>23 Zhirinovsky is not a stupid man. He's a</p> <p>24 clever man. He knows several languages,</p> <p>25 has a higher education degree and also</p>

16 (Pages 64 to 67)

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<p>1 ASHOT EGIAZARYAN 2 including such specific peculiarities. 3 Q. Is the LDPR anti-American? 4 A. I would say that LDPR is by 5 itself, in my, according to my 6 understanding, in spite of the fact that 7 it calls a party, it's not a party. 8 That's why I disagree with the 9 determination that this is a party. 10 Several pronouncements perhaps of 11 Zhirinovsky has pronouncements at certain 12 times of any leaders of parties that are 13 called parties, but again, I would say 14 it's not a party including the United 15 Russia, the Communist party, the 16 utterings of Zugarov, the pronouncements 17 of Putin occasionally, sometimes, you 18 know, bear anti-American, anti-Democratic 19 nature, anti-human nature with which one 20 cannot agree. 21 MR. LUPKIN: Excuse me, I have 22 to confess I didn't understand the 23 translation. 24 THE INTERPRETER: Which part 25 didn't you understand?</p>	<p>1 ASHOT EGIAZARYAN 2 War 2 and the 9/11 attacks? 3 THE INTERPRETER: And your 4 question was did you write? Did 5 you write? 6 MR. GOLDEN: Yes. 7 MR. LUPKIN: Did he write that 8 as part of a sentence, or did he 9 write that -- objection. 10 THE INTERPRETER: The question 11 was whether he wrote this? 12 Q. That wasn't what I meant. 13 I'll ask the question differently. Does 14 that sentence say that the LDPR is 15 associated with anti-Semitism, 16 anti-Americanism, Holocaust denial and 17 blames the Jews for sparking the Russian 18 revolution, World War 2 and the 9/11 19 attacks? 20 MR. LUPKIN: Objection. 21 Objection. Are you asking him what 22 the whole sentence means or just 23 that -- I'm just not following it. 24 A. I could not follow it either. 25 THE INTERPRETER: That's his</p>
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<p>1 ASHOT EGIAZARYAN 2 MR. LUPKIN: There was a word 3 I didn't catch. Sometimes, you 4 know, bear anti-American, 5 anti-Democratic and? 6 THE INTERPRETER: Anti-human 7 nature. 8 MR. LUPKIN: Okay, I 9 apologize. 10 MR. GOLDEN: Would you read to 11 Mr., would you translate for Mr. 12 Egiazaryan that subsection 3 of 13 paragraph 2 on page 2 that begins 14 with "A leader of." 15 (At this time, the requested 16 material was read to the witness.) 17 A. Well, I'm sorry, was meant 18 9/11 meaning 2001, right? 19 Q. Yes. 20 A. Yes. 21 Q. Referring to that section, did 22 you write that the LDPR is associated 23 with anti-Semitism, anti-Americanism, 24 Holocaust denial and blames the Jews for 25 sparking the Russian revolution, World</p>	<p>1 ASHOT EGIAZARYAN 2 response, the witness, I could not 3 follow it either. 4 Q. Where it says 5 ultra-nationalist party, is that the 6 LDPR? 7 MR. LUPKIN: Objection to 8 form. You may answer. May I ask, 9 Mr. Golden, given that the 10 paragraph is in English, that the 11 second sentence of which you're 12 reading a part be reread in its 13 entirety to the witness so that he 14 has it in mind when answering your 15 question? 16 MR. GOLDEN: Sure. 17 THE INTERPRETER: Let us read 18 it. Could you tell me where it 19 begins? 20 MR. LUPKIN: "To further the 21 illegitimate." 22 A. Now I understand. Now I 23 understand it. 24 Q. Is the reference in that 25 sentence to the ultra-nationalist party,</p>

17 (Pages 68 to 71)

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Page 72	Page 74
<p>1 ASHOT EGIAZARYAN</p> <p>2 is that a reference to the LDPR?</p> <p>3 A. As far as I understand it, and</p> <p>4 what is written here using the simple</p> <p>5 language, human language, Zalmayev states</p> <p>6 that I am a leader of ultra-nationalist</p> <p>7 party which is a predetermined lie.</p> <p>8 Q. It's a lie that you're a</p> <p>9 leader?</p> <p>10 A. The lie, what is written here.</p> <p>11 Q. The first question I have is</p> <p>12 where it says ultra-nationalist party,</p> <p>13 does that mean the LDPR?</p> <p>14 A. Let me respond. I would say</p> <p>15 that when this claim, when this complaint</p> <p>16 was prepared, the text was taken from</p> <p>17 Zalmayev's articles and inserted here by</p> <p>18 my lawyers, which is a lie.</p> <p>19 Q. It's a lie that you're a</p> <p>20 leader, is that what the lie is?</p> <p>21 A. The lie is what is -- the lie</p> <p>22 what is written here in this sentence</p> <p>23 that you just quoted.</p> <p>24 Q. Is it a lie that you are a</p> <p>25 leader in the LDPR, or you were?</p>	<p>1 ASHOT EGIAZARYAN</p> <p>2 Q. Did Zhirinovsky deny the</p> <p>3 Holocaust?</p> <p>4 A. If we take a transcript of his</p> <p>5 speeches I can comment, but I have not</p> <p>6 read his speeches, because I did not</p> <p>7 write his speeches. I don't think that</p> <p>8 anybody writes his speeches. He just</p> <p>9 makes pronouncements himself.</p> <p>10 Q. Do you remember Mr.</p> <p>11 Zhirinovsky denying the occurrence of the</p> <p>12 Holocaust?</p> <p>13 A. I did not associate with him</p> <p>14 on political issues.</p> <p>15 Q. The question was do you</p> <p>16 remember him ever saying that the</p> <p>17 Holocaust did not occur?</p> <p>18 A. Well, for me to remember or</p> <p>19 not to remember that I should have heard</p> <p>20 that but I did not hear his speeches, I</p> <p>21 did not read -- I did not read his books,</p> <p>22 I did not read his speeches. I don't</p> <p>23 deny the fact that he can talk about the</p> <p>24 Holocaust, but I'm finding it difficult</p> <p>25 to recall the issues, the topics that I</p>
Page 73	Page 75
<p>1 ASHOT EGIAZARYAN</p> <p>2 A. Both this and that is a lie.</p> <p>3 Q. Well I only want to ask about</p> <p>4 this. Is it a lie that you were a leader</p> <p>5 in the LDPR?</p> <p>6 A. Absolutely.</p> <p>7 Q. Is the LDPR associated with</p> <p>8 anti-Semitism?</p> <p>9 A. I've already responded to this</p> <p>10 question. I can repeat that.</p> <p>11 Q. Is Zhirinovsky associated with</p> <p>12 anti-Semitism?</p> <p>13 A. Well, okay, I'll repeat the</p> <p>14 question that I've just given, I mean the</p> <p>15 answer, sorry, that I've just given.</p> <p>16 MR. LUPKIN: Go ahead.</p> <p>17 A. In his utterances,</p> <p>18 Zhirinovsky, of which I learned recently,</p> <p>19 he allowed anti-Semitic utterances. I</p> <p>20 cannot give you characteristics of his</p> <p>21 pronouncements. I can only give you my</p> <p>22 own evaluation of his pronouncements. It</p> <p>23 is my categoric disagreement with them.</p> <p>24 Did he make such pronouncements? Yes, he</p> <p>25 did.</p>	<p>1 ASHOT EGIAZARYAN</p> <p>2 did not touch upon. If he had said,</p> <p>3 spoken on these issues, I could only</p> <p>4 express my categoric disagreement and</p> <p>5 express my protests.</p> <p>6 Q. Did you ever express your</p> <p>7 protest by resigning your membership in</p> <p>8 The Duma faction of the LDPR?</p> <p>9 MR. LUPKIN: Objection; lacks</p> <p>10 foundation. Please translate.</p> <p>11 A. There were instances when</p> <p>12 people quit the LDPR fraction and then</p> <p>13 went back to that.</p> <p>14 Q. Did you ever quit?</p> <p>15 A. For example, this was such a</p> <p>16 member as Kerimov, who initially quit and</p> <p>17 then reentered, then after the subsequent</p> <p>18 elections he returned.</p> <p>19 MR. GOLDEN: Is he finished?</p> <p>20 A. Yes.</p> <p>21 Q. Did you ever quit the LDPR</p> <p>22 faction?</p> <p>23 A. Me? No. Because I was a</p> <p>24 member of the fraction for the term, for</p> <p>25 that term in the state Duma. It is</p>

18 (Pages 72 to 75)

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<p style="text-align: right;">Page 76</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 different from the membership in the</p> <p>3 party, which is allowed by Russian laws.</p> <p>4 The effective term is like, you know,</p> <p>5 four years expire and then your term</p> <p>6 expires.</p> <p>7 One could quit in between as</p> <p>8 other members did, for example, like</p> <p>9 Kerimov. And then during the next, the</p> <p>10 subsequent elections he was a candidate</p> <p>11 from the, again from the LDPR party.</p> <p>12 MR. GOLDEN: Would you mark</p> <p>13 this, please, as Exhibit 141.</p> <p>14 (Exhibit 141 for</p> <p>15 identification, Bates stamped PZ</p> <p>16 001543.)</p> <p>17 MR. LUPKIN: While the witness</p> <p>18 is reading it, I'll give you the</p> <p>19 Bates number for the document.</p> <p>20 It's PZ 001543.</p> <p>21 MR. GOLDEN: This is in</p> <p>22 Russian, right, do you have a</p> <p>23 translation?</p> <p>24 MR. LUPKIN: We don't have a</p> <p>25 translation, no. Can I just make a</p>	<p style="text-align: right;">Page 78</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 you want me to read the whole statement?</p> <p>3 Q. Not now.</p> <p>4 A. I can read the whole statement</p> <p>5 to you.</p> <p>6 Q. Not now. I just wanted you to</p> <p>7 tell me what it is.</p> <p>8 A. Well, I've just said it in two</p> <p>9 sentences, but I can read it. You mean</p> <p>10 should I retell it or read it?</p> <p>11 Q. No. Is that your name on the</p> <p>12 bottom?</p> <p>13 A. The first name and the last</p> <p>14 name at the bottom are mine.</p> <p>15 Q. When you say the first name</p> <p>16 and the last name, is there something</p> <p>17 else?</p> <p>18 A. The first name, the last name</p> <p>19 and my father's name.</p> <p>20 Q. So that's your name at the</p> <p>21 bottom of the --</p> <p>22 A. Yes, my full name is written</p> <p>23 there, is written there.</p> <p>24 Q. And to the left of your name,</p> <p>25 is that your signature?</p>
<p style="text-align: right;">Page 77</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 request, Jim, while we're, since</p> <p>3 this is a Russian document, one way</p> <p>4 of proceeding here would be to have</p> <p>5 the translator translate on the</p> <p>6 record the document so that those</p> <p>7 of us who don't speak Russian can</p> <p>8 participate in, or at least</p> <p>9 understand what's going on. So I</p> <p>10 leave it to you to conduct your</p> <p>11 examination as you see fit, but I</p> <p>12 would just make that request.</p> <p>13 MR. GOLDEN: I understand.</p> <p>14 THE INTERPRETER: What is your</p> <p>15 decision?</p> <p>16 MR. GOLDEN: Well, we'll take</p> <p>17 it a couple of steps at a time and</p> <p>18 we'll see.</p> <p>19 Q. Mr. Egiazaryan, what is this</p> <p>20 document?</p> <p>21 A. This is the text. It is</p> <p>22 called statement about, which is</p> <p>23 addressed to the Central Election</p> <p>24 Committee about to -- about -- to put a</p> <p>25 candidate, to be a candidate to the -- do</p>	<p style="text-align: right;">Page 79</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 A. No.</p> <p>3 Q. Do you know whose signature</p> <p>4 that is?</p> <p>5 A. No.</p> <p>6 Q. Is this your handwriting?</p> <p>7 A. Of course not. It's a fake.</p> <p>8 Q. When you say it's a fake, what</p> <p>9 do you mean?</p> <p>10 A. There are two, there are two</p> <p>11 variations. Either somebody has written</p> <p>12 this, some Ashot Egiazaryan Gevorgovich,</p> <p>13 who was born the same year and who was</p> <p>14 also being elected to the state Duma at</p> <p>15 that period of time, or it was myself.</p> <p>16 But neither the handwriting nor the</p> <p>17 signature are mine.</p> <p>18 By the way, neither the</p> <p>19 handwriting nor the signature come even</p> <p>20 similar to my handwriting and signature.</p> <p>21 I can characterize it as a crude fake.</p> <p>22 Can one call it a document? Well,</p> <p>23 probably it's for you to judge since you</p> <p>24 have obtained it somewhere. I could only</p> <p>25 make suppositions.</p>

19 (Pages 76 to 79)

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<p>1 ASHOT EGIAZARYAN</p> <p>2 Me personally I'm not</p> <p>3 surprised because, because the criminal</p> <p>4 cases that were fabricated against me</p> <p>5 were based on analogous documents and</p> <p>6 that's why I think it's the same, one and</p> <p>7 the same source.</p> <p>8 MR. GOLDEN: I would ask the</p> <p>9 translator --</p> <p>10 A. One can establish this in a</p> <p>11 very elementary way. I can submit</p> <p>12 samples of my handwriting and samples of</p> <p>13 my signature.</p> <p>14 MR. LUPKIN: Just answer the</p> <p>15 question.</p> <p>16 A. In Russia nobody needs that.</p> <p>17 MR. GOLDEN: I'll ask the</p> <p>18 translator to read the indented</p> <p>19 block at the top, please.</p> <p>20 THE INTERPRETER: I'm sorry,</p> <p>21 what is intended --</p> <p>22 MR. GOLDEN: Indented.</p> <p>23 THE INTERPRETER: Oh this one,</p> <p>24 the caption?</p> <p>25 MR. GOLDEN: Yes.</p>	<p>1 ASHOT EGIAZARYAN</p> <p>2 LDPR.</p> <p>3 MR. GOLDEN: Is that the end</p> <p>4 of the sentence?</p> <p>5 THE INTERPRETER: No, no.</p> <p>6 MR. GOLDEN: Keep going.</p> <p>7 THE INTERPRETER: "To suggest</p> <p>8 me as a candidate to the deputies</p> <p>9 of the state Duma of the Federal</p> <p>10 Assembly of the Russian Federation</p> <p>11 of the third," I believe it's "of</p> <p>12 the Third Assembly for the federal</p> <p>13 election district."</p> <p>14 Q. Did you submit your candidacy</p> <p>15 in 1999 as a representative for the LDPR?</p> <p>16 A. Yes.</p> <p>17 MR. GOLDEN: Would the</p> <p>18 translator please translate the</p> <p>19 last sentence of the document.</p> <p>20 THE INTERPRETER: "Membership</p> <p>21 in the public amalgamation:</p> <p>22 Member" --</p> <p>23 What is this word?</p> <p>24 (Interpreters confer.)</p> <p>25 THE INTERPRETER: "Of the</p>
Page 81	Page 83
<p>1 ASHOT EGIAZARYAN</p> <p>2 THE INTERPRETER: "To the</p> <p>3 Central Election Committee of the</p> <p>4 Russian Federation from candidate</p> <p>5 to the deputies of the state Duma</p> <p>6 of the Federal Assembly, of the</p> <p>7 Russian Federation, Ashot</p> <p>8 Gevorgovich Egiazaryan."</p> <p>9 I'm sorry. His objection was</p> <p>10 I changed the order. I said in</p> <p>11 America we used the first name and</p> <p>12 then the father's name and then the</p> <p>13 last name.</p> <p>14 MR. GOLDEN: Would you</p> <p>15 translate the first sentence in the</p> <p>16 main part of the document.</p> <p>17 THE INTERPRETER: "I submit my</p> <p>18 agreement to the election</p> <p>19 amalgamation putting me as a</p> <p>20 candidate of the general Russian"</p> <p>21 -- I'm sorry, I'm just having</p> <p>22 difficulties reading handwriting.</p> <p>23 "Of the public political</p> <p>24 organization Liberal Democratic</p> <p>25 Party of Russia." In parentheses</p>	<p>1 ASHOT EGIAZARYAN</p> <p>2 general Russian public political</p> <p>3 organization Liberal Democratic</p> <p>4 Party of Russia."</p> <p>5 And the witness commented to</p> <p>6 my query.</p> <p>7 A. Since it was not me who wrote</p> <p>8 it, I'm finding it also difficult to read</p> <p>9 the handwriting.</p> <p>10 Q. In 1999 were you on the party</p> <p>11 list or were you running to be directly</p> <p>12 elected?</p> <p>13 A. The party list.</p> <p>14 Q. And is this, do the words of</p> <p>15 this document submit Ashot Egiazaryan's</p> <p>16 candidacy to be on the party list?</p> <p>17 MR. LUPKIN: Objection. The</p> <p>18 document speaks for itself or</p> <p>19 doesn't speak for itself.</p> <p>20 THE INTERPRETER: I'm sorry,</p> <p>21 can you repeat your question,</p> <p>22 please.</p> <p>23 Q. And is this document, the</p> <p>24 words of this document a submission for</p> <p>25 Ashot Egiazaryan to be on the LDPR party</p>

20 (Pages 80 to 83)

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1 ASHOT EGIAZARYAN
2 list in 1999?

3 A. It is not my, it is not my
4 application.

5 Q. Did you submit an application
6 to be on the party list in 1999?

7 A. When a package for any
8 candidate to The Duma was being prepared,
9 there was a large number of forms that
10 were filled in, that I filled in and
11 signed.

12 Q. Did you fill in the forms by
13 hand or were they typed or prepared on a
14 computer?

15 MR. LUPKIN: Translate it. I
16 have a question. One second.
17 Objection. Point of clarification.
18 Are you asking whether the form was
19 typed or handwritten or whether it
20 was filled out in handwriting?

21 Q. Mr. Egiazaryan, you said that
22 in 1999 there were a lot of forms to be
23 completed and submitted; is that right?

24 A. And in 2003 and in 2007 this
25 was a standard procedure.

1 ASHOT EGIAZARYAN

2 Q. And in 1999 did you complete
3 some of those forms in handwriting?

4 A. I don't remember already how
5 these forms were completed, were filled
6 in. It was 12 years ago. What I
7 remember for all the years they were
8 printed in the computer.

9 Q. Did Mr. Zalmayev damage your
10 reputation?

11 A. No doubt, yes.

12 Q. How?

13 A. With his articles that were
14 based on lies and defamation and that
15 included, that incorporated lies.

16 Q. What was your reputation
17 before Mr. Zalmayev's articles?

18 A. Honestly speaking, I do not
19 possess any reputation in the United
20 States, but thanks to Zalmayev I have to
21 begin with bad, with bad reputation based
22 on lies. Whether it's normal or not, I
23 don't think it is normal.

24 Q. Before Mr. Zalmayev's words,
25 what was your reputation in Russia?

1 ASHOT EGIAZARYAN

2 A. I think that my reputation in
3 Russia was normal. Again, I can give you
4 my own evaluation.

5 Q. What was it? What was your
6 reputation?

7 A. I've answered that question.
8 I cannot add anything else.

9 Q. And what was your, what became
10 of your reputation in Russia after Mr.
11 Zalmayev's articles?

12 A. Mr. Zalmayev also published or
13 made or had such articles published also
14 in Russian publications. I think it was
15 the newspaper Moscow Times, Moscow News.

16 Q. And what is your reputation
17 after those articles?

18 MR. LUPKIN: Excuse me, in
19 Russia or here?

20 MR. GOLDEN: In Russia.

21 A. I think that naturally these
22 articles pursued a certain purpose, the
23 purpose of discrediting me. And I think
24 that this has had its effect.

25 Q. Before the articles, did --

1 ASHOT EGIAZARYAN

2 A. As any other lie directed
3 against any other person, absolutely.

4 Q. Before the article, was your
5 reputation in Russia a good reputation?

6 MR. LUPKIN: Objection.

7 Generally, or on a specific topic?

8 MR. GOLDEN: Generally.

9 A. I think that since I was able
10 to engage in large business projects with
11 foreign, large foreign banks, they gave
12 me credits, I think to your question
13 whether it was good reputation or a bad
14 one, I think this is a good response. As
15 far as any other human being is
16 concerned, if banks, foreign banks
17 furnish credits to you, I think that this
18 is a very good sign that the reputation
19 is good.

20 If the reputation is bad,
21 banks do not offer you credits.

22 Q. And how did Mr. Zalmayev's
23 articles change your reputation in
24 Russia?

25 A. I've already said it in my

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<p style="text-align: right;">Page 88</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 previous response. Zalmayev's articles,</p> <p>3 as a rule, they were directed towards my</p> <p>4 discreditation. I don't know if now I go</p> <p>5 to a bank and ask, and ask for a credit,</p> <p>6 I'm not sure so sure if I'm going to get</p> <p>7 it. The bank would produce an article</p> <p>8 and say that I am the one that Zalmayev</p> <p>9 described me in his articles is going to</p> <p>10 be rather difficult for me to engage in</p> <p>11 business.</p> <p>12 MR. LUPKIN: Excuse me, Jim,</p> <p>13 at an appropriate time, it's about</p> <p>14 ten after one, we should probably</p> <p>15 talk about arrangements for a lunch</p> <p>16 break. So whenever it's convenient</p> <p>17 for you.</p> <p>18 Q. That didn't happen though, did</p> <p>19 it?</p> <p>20 A. No, that hasn't happened yet.</p> <p>21 Q. So are you saying that before</p> <p>22 the articles in Russia you had a good</p> <p>23 reputation and now you have a bad</p> <p>24 reputation?</p> <p>25 A. I can say that if we take in a</p>	<p style="text-align: right;">Page 90</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 A. Absolutely, you are right.</p> <p>3 Q. Would you turn to Exhibit 32</p> <p>4 in that book. Mr. Egiazaryan, can you</p> <p>5 see the -- do you understand the date of</p> <p>6 this article?</p> <p>7 A. Yes, I can see that.</p> <p>8 Q. Other than preparing for this</p> <p>9 deposition, did anybody show this article</p> <p>10 to you?</p> <p>11 A. No. Just a minute. May I</p> <p>12 read it?</p> <p>13 Q. Yes. When you say read it,</p> <p>14 you mean have the translator read the</p> <p>15 whole --</p> <p>16 A. Or if you give me the text and</p> <p>17 I'll read it myself.</p> <p>18 MR. LUPKIN: You mean in</p> <p>19 Russian?</p> <p>20 THE WITNESS: Yes, in Russian,</p> <p>21 of course.</p> <p>22 Q. As part of your preparation</p> <p>23 for this deposition, was this article</p> <p>24 translated for you?</p> <p>25 A. I don't remember. I have this</p>
<p style="text-align: right;">Page 89</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 chronological order the time specified,</p> <p>3 the time, it is precisely this. It</p> <p>4 happened at one period of time. And in</p> <p>5 my opinion, as I've already said,</p> <p>6 Zalmayev is a composite part of that,</p> <p>7 he's a -- he's the doer, he's the</p> <p>8 executor of this plan, but not a separate</p> <p>9 figure, not a separate individual who's</p> <p>10 engaged in learning about somebody or</p> <p>11 describing somebody, in particular I mean</p> <p>12 myself.</p> <p>13 Q. Did you say that before Mr.</p> <p>14 Zalmayev's articles you had no reputation</p> <p>15 in the United States?</p> <p>16 A. Prior to that I was not</p> <p>17 engaged, I did not possess, I did not</p> <p>18 occupy any public position, I did not, I</p> <p>19 do not have any articles or speeches in</p> <p>20 the United States.</p> <p>21 Q. And do you think now you have</p> <p>22 a bad reputation in the United States?</p> <p>23 MR. LUPKIN: Objection; asked</p> <p>24 and answered. You may answer it</p> <p>25 again.</p>	<p style="text-align: right;">Page 91</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 impression that I'm seeing for the first</p> <p>3 time. I cannot tell you exactly because</p> <p>4 I don't know the text.</p> <p>5 MR. GOLDEN: Would the</p> <p>6 translator please read to the</p> <p>7 witness the title of this article</p> <p>8 that begins with the word</p> <p>9 "corruption." And would the</p> <p>10 translator now read the first</p> <p>11 sentence.</p> <p>12 THE INTERPRETER: Starting</p> <p>13 with "The Hotel Moscow"?</p> <p>14 MR. GOLDEN: Yes.</p> <p>15 (At this time, the requested</p> <p>16 material was read to the witness.)</p> <p>17 Q. Now please turn to page 3.</p> <p>18 A. Well, I have to read the text.</p> <p>19 I cannot comment separate, separately</p> <p>20 taken sentences.</p> <p>21 Q. Okay.</p> <p>22 MR. GOLDEN: My suggestion</p> <p>23 then is why don't we take our break</p> <p>24 for lunch now and I would ask that</p> <p>25 you confer with your translator and</p>

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1 ASHOT EGIAZARYAN
2 have him read this whole article to
3 you.
4 MR. LUPKIN: My thought is
5 this, while we're certainly willing
6 to do what we need to do in order
7 to facilitate the orderly process
8 of this deposition, it seems to me
9 that there are really two ways to
10 proceed. One is to have a written,
11 Russian, certified translation of
12 this article so that the witness
13 can review it appropriately, or
14 alternatively, to have the official
15 translator translate it for the
16 witness, so that for the purposes
17 of the record the witness will be
18 answering questions based on the
19 translation of the person who has
20 been sworn in as the official
21 translator of this document.
22 MR. GOLDEN: Val, if you were
23 translating this and just reading
24 orally, how long would it take you
25 to do that?

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1 ASHOT EGIAZARYAN
2 THE INTERPRETER: Well it's
3 like you're reading in English
4 slowly. But if you need a
5 certified, I don't know, I can do
6 this tonight.
7 MR. GOLDEN: No, no, it
8 doesn't have to be, it doesn't have
9 to be certified.
10 THE INTERPRETER: I do
11 certified translations for trials.
12 MR. GOLDEN: I understand.
13 All right, well, we'll try two
14 things when we come back from
15 lunch.
16 MR. LUPKIN: What time do you
17 want to resume?
18 MR. GOLDEN: I think probably
19 it will take an hour.
20 (Luncheon recess: 1:17 p.m.)
21
22
23
24
25

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1 ASHOT EGIAZARYAN
2 A F T E R N O O N S E S S I O N
3 2:33 p.m.
4 THE VIDEOGRAPHER: The time is
5 2:36 p.m., we're back on the
6 record.
7 VALERII M. SCHUKIN,
8 called as the interpreter in this
9 action, resumed, having been
10 previously sworn.
11 IGOR VESLER,
12 called as the check interpreter
13 in this action, resumed, having
14 been previously sworn.
15 ASHOT EGIAZARYAN,
16 resumed, having been previously
17 duly sworn, was examined and
18 testified through the interpreter
19 further as follows:
20 CONTINUED EXAMINATION
21 BY MR. GOLDEN:
22 **Q. Mr. Egiazaryan, you referred**
23 **to that LDPR lists for the elections, do**
24 **you remember that?**
25 **A. In which context?**

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1 ASHOT EGIAZARYAN
2 **Q. In 1999 when you first ran for**
3 **The Duma, you said that there was a party**
4 **list, do you remember that?**
5 **A. Yes.**
6 **Q. In what order were the names**
7 **on that list?**
8 MR. LUPKIN: Objection to
9 form. You may answer.
10 **A. Honestly, I don't remember.**
11 **Q. At any time were the party**
12 **lists for elections prepared according to**
13 **the party's view of how important each**
14 **candidate was?**
15 **A. I can say that I did not take**
16 **part in the preparation of lists. That**
17 **is exact.**
18 **Q. Do you remember where your**
19 **name appeared on any of the three lists?**
20 MR. LUPKIN: Objection to
21 form. You may answer.
22 **A. Of course I don't.**
23 MR. GOLDEN: I'm going to ask
24 the translator to translate a
25 portion of Exhibit 32. Exhibit 32

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<p style="text-align: right;">Page 96</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 is a three-page article from the</p> <p>3 Washington Times from November</p> <p>4 23rd, 2009. Actually there's one</p> <p>5 sentence on the fourth page. So I</p> <p>6 would like the translator to</p> <p>7 translate from the top of page 3</p> <p>8 beginning with the phrase "in the</p> <p>9 case of the Hotel Moscow" through</p> <p>10 to the end of the article which is</p> <p>11 on the top of the fourth page.</p> <p>12 MR. LUPKIN: Excuse me, if I</p> <p>13 may be heard on this for a moment.</p> <p>14 I object to partial translations of</p> <p>15 the article. The article is in</p> <p>16 English. English is not the</p> <p>17 witness' native tongue, and</p> <p>18 articles must be read in context.</p> <p>19 I'm happy to have you ask him</p> <p>20 questions about any or all of the</p> <p>21 article, but I would ask, I would</p> <p>22 insist that either one of two</p> <p>23 things happen. Either, that the</p> <p>24 entire document be translated to</p> <p>25 the witness now, or that we</p>	<p style="text-align: right;">Page 98</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 opportunity to do that then.</p> <p>3 Please read the page,</p> <p>4 beginning on page 3, to the witness</p> <p>5 as I requested.</p> <p>6 (At this time, the requested</p> <p>7 material was read to the witness.)</p> <p>8 Q. Mr. Egiazaryan, what is</p> <p>9 Decorum Corp.?</p> <p>10 A. You know, it is very difficult</p> <p>11 for me to comment on certain spots in</p> <p>12 this article because there are certain</p> <p>13 companies that I have never heard, never</p> <p>14 heard of them before. And some of the</p> <p>15 moments here, not, not sort of unclear to</p> <p>16 me, but simply unknown to me.</p> <p>17 That final phrase, is that the</p> <p>18 end of the article or is there a</p> <p>19 continuation? I'm not asking you a</p> <p>20 question, I'm just making a statement.</p> <p>21 It's unclear to me. And also the</p> <p>22 beginning of what was read not clear to</p> <p>23 me.</p> <p>24 Q. The question --</p> <p>25 A. I would be very grateful to</p>
<p style="text-align: right;">Page 97</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 postpone questioning on this</p> <p>3 document so that between now and</p> <p>4 tomorrow a complete certified</p> <p>5 translation of the document can be</p> <p>6 provided to the witness.</p> <p>7 MR. GOLDEN: It will take too</p> <p>8 long and waste valuable time to</p> <p>9 have the whole document read. The</p> <p>10 witness and you had an opportunity</p> <p>11 to read the whole document. I'm</p> <p>12 going to ask him questions. If he</p> <p>13 can't answer the questions then</p> <p>14 he'll tell me he can't answer the</p> <p>15 questions.</p> <p>16 MR. LUPKIN: I'm not, I'm not</p> <p>17 prepared to allow that to occur. I</p> <p>18 don't think that that's an</p> <p>19 appropriate way to question about</p> <p>20 an English language document and if</p> <p>21 that's the way you intend upon</p> <p>22 proceeding, I'm going to direct the</p> <p>23 witness not to answer questions on</p> <p>24 it.</p> <p>25 MR. GOLDEN: You'll have an</p>	<p style="text-align: right;">Page 99</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 you if I -- if I was read the same way,</p> <p>3 the beginning and the ending of this</p> <p>4 article, then I would -- then I would</p> <p>5 probably be able to comment on this, but</p> <p>6 at this stage it's difficult to,</p> <p>7 practically impossible to comment on what</p> <p>8 I don't know.</p> <p>9 Q. You were read to the end of</p> <p>10 the article.</p> <p>11 A. Thank you.</p> <p>12 Q. Now my question was not about</p> <p>13 the article. My question was about a</p> <p>14 company named Decorum Corp. Have you</p> <p>15 heard of it?</p> <p>16 A. Decorum Corp.? I have.</p> <p>17 Q. What is it?</p> <p>18 A. There were several companies</p> <p>19 Decorum Corp. Which one are you talking</p> <p>20 about? I'll make my comments.</p> <p>21 Q. How many are there?</p> <p>22 A. Well, I knew at minimum two of</p> <p>23 them.</p> <p>24 Q. Tell me about them both.</p> <p>25 A. One company Decorum Corp. was</p>

24 (Pages 96 to 99)

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<p style="text-align: right;">Page 100</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 the one that was incorporated, created,</p> <p>3 in the United States in the State of</p> <p>4 Delaware. An old company I think, no,</p> <p>5 not a very old company, but a company</p> <p>6 that is over ten years old.</p> <p>7 Then was a company Decorum</p> <p>8 Corp. BVI, that was created, well, I</p> <p>9 don't remember in what year, I don't want</p> <p>10 to tell you a lie, but a long time ago.</p> <p>11 Q. The first one, the -- I'm</p> <p>12 sorry.</p> <p>13 A. And the third company, which</p> <p>14 did not incorporate the word Corp., just</p> <p>15 Decorum. That is why -- which is the</p> <p>16 context, which companies are you talking</p> <p>17 about?</p> <p>18 Q. The first one that's called</p> <p>19 Decorum Corp. that was a United States</p> <p>20 corporation, did you have an ownership</p> <p>21 directly or indirectly in that company?</p> <p>22 A. What was it?</p> <p>23 Q. What was it? I'll ask the</p> <p>24 question again. The first, the first</p> <p>25 corporation which you said was a United</p>	<p style="text-align: right;">Page 102</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 Q. Who were the owners of Decorum</p> <p>3 Corp.?</p> <p>4 A. As far as I know, Yudin,</p> <p>5 Y-u-d-i-n, was the owner and Milyavsky,</p> <p>6 M-i-l-y-a-v-s-k-y. I don't know what the</p> <p>7 percentage of ownership they had and who</p> <p>8 was the -- who was the beneficiary owner</p> <p>9 and who was the registered owner, but</p> <p>10 these are the two men that I considered</p> <p>11 to be the owners.</p> <p>12 Q. The second company you</p> <p>13 mentioned, you said was BVI, is that</p> <p>14 British Virgin Islands company?</p> <p>15 A. Yes.</p> <p>16 Q. Were you --</p> <p>17 A. I may be mistaken about the</p> <p>18 jurisdiction, yes, but that was the</p> <p>19 second company.</p> <p>20 Q. Did you directly or indirectly</p> <p>21 own any of the second Decorum company?</p> <p>22 A. Yes.</p> <p>23 Q. What was -- why did you --</p> <p>24 were you involved in the formation of</p> <p>25 that company?</p>
<p style="text-align: right;">Page 101</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 States corporation did you directly or</p> <p>3 indirectly have an ownership interest in</p> <p>4 it?</p> <p>5 A. Whether I owned this company</p> <p>6 or not?</p> <p>7 Q. Did you directly or indirectly</p> <p>8 own all or part of the company?</p> <p>9 A. I do not own it.</p> <p>10 Q. When did you learn about that</p> <p>11 company?</p> <p>12 A. I would say sometime maybe</p> <p>13 about 10, 11 years ago.</p> <p>14 Q. In what situation did you</p> <p>15 learn about it?</p> <p>16 A. Initially I learned about it</p> <p>17 from the press or from my acquaintances.</p> <p>18 Q. Was Decorum Corp., the one</p> <p>19 that we're talking about, involved in the</p> <p>20 Hotel Moscow project?</p> <p>21 A. Yes.</p> <p>22 Q. What was its involvement?</p> <p>23 A. It won the tender to</p> <p>24 reconstruct the hotel. Sorry, tender, it</p> <p>25 won the tender.</p>	<p style="text-align: right;">Page 103</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 A. Yes.</p> <p>3 Q. For what purpose did you form</p> <p>4 it?</p> <p>5 A. For the purposes of</p> <p>6 participating in the Hotel Moscow</p> <p>7 project.</p> <p>8 Q. Who were the owners of that</p> <p>9 Decorum other than you?</p> <p>10 A. Nobody.</p> <p>11 Q. The third, the third Decorum</p> <p>12 company, what was your involvement with</p> <p>13 that one?</p> <p>14 A. It was a Russian company.</p> <p>15 Q. But what was your involvement</p> <p>16 with it?</p> <p>17 A. Fully.</p> <p>18 Q. Did you own it?</p> <p>19 A. Through -- yes, I did.</p> <p>20 Q. For what purpose did you form</p> <p>21 the company?</p> <p>22 A. Only one purpose, to</p> <p>23 reconstruct the hotel.</p> <p>24 Q. Were you aware that this</p> <p>25 article said that you were suspected of</p>

25 (Pages 100 to 103)

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<p style="text-align: right;">Page 104</p> <p>1 ASHOT EGIAZARYAN 2 having ties with criminal networks? 3 MR. LUPKIN: Please translate 4 it. I'm not going to permit the 5 witness to answer that question 6 absent a full translation of this 7 article. 8 MR. GOLDEN: Does it have 9 something to do with privilege? 10 MR. LUPKIN: I've stated the 11 rationale for my position on the 12 record already. It hasn't changed 13 from when I articulated it. Let's 14 please continue. 15 Q. Mr. Egiazaryan, are you aware 16 of any publication that ever said that 17 you were suspected of ties with criminal 18 networks? 19 A. I do not recall. 20 Q. Were you aware that -- 21 A. There were many publications 22 on various subjects. I can provide you 23 with my comments regarding some specific 24 article. 25 Q. You mean when I show you the</p>	<p style="text-align: right;">Page 106</p> <p>1 ASHOT EGIAZARYAN 2 National Bank? 3 A. I joined the Moscow National 4 Bank, I don't remember exactly the year, 5 but after it was already founded. First 6 I became first deputy to the chairman of 7 the board. Then I became the chairman of 8 the board. I don't remember the year. 9 Q. For how long did you work at 10 Moscow National Bank? 11 MR. LUPKIN: In any capacity 12 or in the capacity as chairman? 13 MR. GOLDEN: Any capacity. 14 MR. LUPKIN: You may answer. 15 A. Actually, I -- I worked till 16 the beginning, approximately, of 1996 17 till June of 1996. I had a long break 18 that I did not work, I did not 19 participate in the operations of the bank 20 for about a year. I started working in 21 1993 or '94. Then in 1995 there was a 22 long period that I didn't work. And in 23 the beginning of 1996, in the first half 24 of 1996, I quit the bank. 25 Q. How long were you the</p>
<p style="text-align: right;">Page 105</p> <p>1 ASHOT EGIAZARYAN 2 article? 3 A. Naturally. How can I else 4 comment what I am not seeing? 5 Q. Were you aware that this 6 article said that "For the past two 7 decades Mr. Egiazaryan has colluded with 8 Moscow government officials to secure 9 properties illegally and development 10 rights at a fraction of their real 11 value"? 12 THE INTERPRETER: Can you give 13 me the paragraph number? 14 MR. GOLDEN: It's the one that 15 begins, the paragraph begins "one 16 investigator." I started to read 17 from the end of the second line and 18 the beginning of the third line. 19 MR. LUPKIN: I object. I'm 20 going to direct the witness not to 21 answer based on the rationale I've 22 articulated on the record thus far. 23 Please continue. 24 Q. Mr. Egiazaryan, were you 25 involved in the founding of Moscow</p>	<p style="text-align: right;">Page 107</p> <p>1 ASHOT EGIAZARYAN 2 chairman? 3 A. Well, perhaps for about three 4 years, maybe three and a half years. 5 Q. And for how long were you the 6 first deputy to the chairman? 7 A. Not long. I don't remember. 8 I remember it was not long. 9 Q. That means shorter than the 10 time you were the chairman? 11 A. Yes, I was the chairman for 12 longer. 13 Q. When did you leave? I'm 14 sorry. Why did you leave? 15 A. I quit because I engaged in a 16 more interesting job, more interesting 17 work I thought. So it was more 18 interesting, creative work, activity. 19 That was one thing. 20 And also the second factor, 21 which was not less important, that at the 22 bank I was an employee, I was not a -- I 23 was not an incorporator or creator of 24 that bank, and I had a desire to engage 25 in my own business.</p>

26 (Pages 104 to 107)

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<p style="text-align: right;">Page 108</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 Q. What did you do after you left</p> <p>3 Moscow National Bank?</p> <p>4 A. After I quit the Moscow bank,</p> <p>5 I started creating a telecommunication</p> <p>6 holding information business together</p> <p>7 with, with Potanin's companies, <i>one of which was</i></p> <p>8 P-o-t-a-n-i-n apostrophe S, Prof-Media.</p> <p>9 We wanted to merge publishing operations.</p> <p>10 At that time we owned the Pravda,</p> <p>11 P-r-a-v-d-a, publishing house. It is a</p> <p>12 large industrial enterprise that</p> <p>13 published all periodic, large circulation</p> <p>14 publications and as well also merge or</p> <p>15 unite in one big holding company that</p> <p>16 would engage in transmitting TV signal.</p> <p>17 The problem was that the</p> <p>18 equipment that all the TV industry of the</p> <p>19 Soviet Union used was of poor quality.</p> <p>20 It had been made in the old Soviet Union.</p> <p>21 It was transmitted using the radio mast</p> <p>22 relaying method not via satellites. That</p> <p>23 is from station to station which were</p> <p>24 positioned at a distance of 10, 11</p> <p>25 kilometers.</p>	<p style="text-align: right;">Page 110</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 Egiazaryan is explaining. I'd like</p> <p>3 you to let him finish his answer.</p> <p>4 MR. GOLDEN: It's not. And</p> <p>5 I'm going on to the next because</p> <p>6 he's going to go on forever.</p> <p>7 MR. LUPKIN: Please note for</p> <p>8 the record that the witness has not</p> <p>9 completed his answer. I don't want</p> <p>10 to disrupt the orderly flow of this</p> <p>11 examination, but I would ask, Mr.</p> <p>12 Golden, that the next time you ask</p> <p>13 a question you permit the witness</p> <p>14 to answer the question in its</p> <p>15 entirety. And if you want a more</p> <p>16 precise answer, that you ask a more</p> <p>17 precise question. But please</p> <p>18 continue.</p> <p>19 Q. Mr. Egiazaryan, did you ever</p> <p>20 have any affiliation with Unikombank?</p> <p>21 A. Unikombank I represented -- at</p> <p>22 that bank I represented a group of</p> <p>23 companies.</p> <p>24 Q. I just -- I don't want to get</p> <p>25 off track, so just tell me yes or no,</p>
<p style="text-align: right;">Page 109</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 Q. Let me stop you.</p> <p>3 MR. LUPKIN: Actually, I'd</p> <p>4 like the witness to finish his</p> <p>5 answer. You asked him a question</p> <p>6 and he's answering it.</p> <p>7 MR. GOLDEN: No, I want to</p> <p>8 stop him because I asked him what</p> <p>9 he did next and he's telling me,</p> <p>10 he's telling me --</p> <p>11 MR. LUPKIN: That's what he's</p> <p>12 telling you.</p> <p>13 MR. GOLDEN: He's telling me</p> <p>14 about satellite, non-satellite and</p> <p>15 TV tower transmissions which has</p> <p>16 nothing to do with my answer and</p> <p>17 it's wasting time. So either he</p> <p>18 misunderstood my question, or he's</p> <p>19 doing it deliberately. Either way,</p> <p>20 there's no reason for him to go on</p> <p>21 on this topic.</p> <p>22 MR. LUPKIN: Mr. Golden, I</p> <p>23 didn't pose the question, you did.</p> <p>24 And your question was what did you</p> <p>25 do after that, and that's what Mr.</p>	<p style="text-align: right;">Page 111</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 were you ever affiliated in any way with</p> <p>3 Unikombank?</p> <p>4 MR. LUPKIN: If you can answer</p> <p>5 the question yes or no, you may do</p> <p>6 so.</p> <p>7 A. Yes.</p> <p>8 Q. Were you an employee of</p> <p>9 Unikombank?</p> <p>10 A. No.</p> <p>11 Q. Were you an owner of</p> <p>12 Unikombank?</p> <p>13 A. Yes.</p> <p>14 Q. What percentage of Unikombank,</p> <p>15 approximately, did you own?</p> <p>16 A. Less than the control package.</p> <p>17 Q. Does that mean less than 50</p> <p>18 percent?</p> <p>19 A. Absolutely correct.</p> <p>20 Q. Did you own more than 25</p> <p>21 percent?</p> <p>22 A. Yes, it was more than 25</p> <p>23 percent.</p> <p>24 Q. Do you remember approximately</p> <p>25 the percentage that you owned?</p>

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<p>1 ASHOT EGIAZARYAN</p> <p>2 A. Well, approximately. The</p> <p>3 control package belonged to the Moscow</p> <p>4 district and the second largest share</p> <p>5 after Moscow district was within the</p> <p>6 ownership of companies controlled by me.</p> <p>7 There were two or three companies.</p> <p>8 Q. What was that percentage,</p> <p>9 approximately, that was owned by you or</p> <p>10 companies controlled by you?</p> <p>11 A. There were emissions</p> <p>12 conducted, I cannot tell you exactly the</p> <p>13 percentage. It fluctuated between 35 and</p> <p>14 45 percent. I'm just afraid of making a</p> <p>15 mistake. But this was the second</p> <p>16 significant owner.</p> <p>17 Q. Were you on the Board of</p> <p>18 Directors?</p> <p>19 A. Yes.</p> <p>20 Q. For how long were you on the</p> <p>21 Board of Directors?</p> <p>22 A. About a year and a half,</p> <p>23 between a year and a half and two years.</p> <p>24 Q. Why did you leave the Board of</p> <p>25 Directors?</p>	<p>1 ASHOT EGIAZARYAN</p> <p>2 In view of that, the</p> <p>3 management, the government of the Moscow</p> <p>4 district as represented by Tiazhelev, Tyazhlov</p> <p>5 Anatoly Tiazhelev, T-i-a-z-h-e-l-o-v, Tyazhlov</p> <p>6 talks to me, addressed me in the summer</p> <p>7 of 1996 so that I would get involved and</p> <p>8 invest my efforts to organize the salvage</p> <p>9 of the bank, which was done.</p> <p>10 I'm not going to take up your</p> <p>11 time and tell you how it was done, but</p> <p>12 everything was done, the management of</p> <p>13 Unikombank on the part of the Central</p> <p>14 Bank, and the bankruptcy procedures were</p> <p>15 terminated, the temporary administration</p> <p>16 left the bank.</p> <p>17 And I was one of the members</p> <p>18 of the Board of Directors up until some</p> <p>19 time in 1998. I had my own views on the</p> <p>20 development of the policies and</p> <p>21 strategies of Unikombank as a bank. The</p> <p>22 government of the Moscow district, with</p> <p>23 which I had good relations and these</p> <p>24 relations remained, they had different</p> <p>25 views.</p>
Page 113	Page 115
<p>1 ASHOT EGIAZARYAN</p> <p>2 A. Because as I've already said,</p> <p>3 the control package of shares belonged to</p> <p>4 the government of Moscow district. At</p> <p>5 the time when I, rather, my companies,</p> <p>6 became the creators of, incorporators of</p> <p>7 that bank at that time the bank was in</p> <p>8 the procedure of filing for bankruptcy.</p> <p>9 The management of the bank was</p> <p>10 fired at that time and the deputy</p> <p>11 chairman of the Central Bank of Russia, Artemyev</p> <p>12 Artem Yeva, Artem Yeva, managed</p> <p>13 that bank, and in view, in connection</p> <p>14 with the bankruptcy, the old management</p> <p>15 of the bank as managed by Antonov,</p> <p>16 A-n-t-o-n-o-v, was removed.</p> <p>17 In view of the fact that there</p> <p>18 were lots of investors, private persons,</p> <p>19 private people investors in the bank and</p> <p>20 also the legal entities in the bank, the</p> <p>21 management of the Central Bank couldn't</p> <p>22 remain in the shade about what was</p> <p>23 happening at the bank and also the</p> <p>24 procedure of bankruptcy that started</p> <p>25 prior to my joining the bank.</p>	<p>1 ASHOT EGIAZARYAN</p> <p>2 In view of this I decided to</p> <p>3 exit the composition of the creators of,</p> <p>4 incorporators of that bank. At that time</p> <p>5 the management started negotiating with</p> <p>6 Aleksey Prokhorov, I'm sorry, Mikhail,</p> <p>7 Mikhail Prokhorov, P-r-o-k-h-o-r-o-v,</p> <p>8 from Anexim Bank, but finally they</p> <p>9 decided to do with Gutabank, and took</p> <p>10 that bank as a partner and he started</p> <p>11 dealing, handling Unikombank together</p> <p>12 with the government of Moscow district.</p> <p>13 What transpired later on,</p> <p>14 subsequently to Unikombank, I was not</p> <p>15 informed about that, but I could only</p> <p>16 suppose, I could only make suppositions.</p> <p>17 Q. You said, did you say that you</p> <p>18 were involved in the formation of the</p> <p>19 bank?</p> <p>20 MR. LUPKIN: Excuse me, you're</p> <p>21 talking about Unikom?</p> <p>22 MR. GOLDEN: Yes.</p> <p>23 A. No, I did not say that.</p> <p>24 Q. Were you asked to leave the</p> <p>25 board?</p>

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<p style="text-align: right;">Page 116</p> <p>1 ASHOT EGIАЗARYAN</p> <p>2 A. No.</p> <p>3 Q. Did you sell your ownership</p> <p>4 interest in Unikombank?</p> <p>5 A. Yes, somehow naturally.</p> <p>6 Q. Who did you sell it to?</p> <p>7 A. I don't remember how it was</p> <p>8 done. The first deputy was engaged in</p> <p>9 Vlasov, V-l-a-s-o-v, the first deputy of</p> <p>10 Moscow district. He was the chairman of</p> <p>11 the Board of Directors. He was handling</p> <p>12 all the technology of the whole thing.</p> <p>13 In a fashion, in an order established by</p> <p>14 the law, the procedure was conducted. It</p> <p>15 was not something of importance.</p> <p>16 Q. Did you make a profit on your</p> <p>17 investment in Unikombank?</p> <p>18 A. No. I would even say maybe</p> <p>19 more, no.</p> <p>20 THE VIDEOGRAPHER: This will</p> <p>21 end tape 2 in the deposition of</p> <p>22 Ashot Egiазaryan. The time is 3:22</p> <p>23 p.m., we're off the record.</p> <p>24 (A recess was taken.)</p> <p>25 THE VIDEOGRAPHER: This is the</p>	<p style="text-align: right;">Page 118</p> <p>1 ASHOT EGIАЗARYAN</p> <p>2 in what context it is written.</p> <p>3 Q. Give an example of a context</p> <p>4 where you consider it to be --</p> <p>5 MR. LUPKIN: Excuse me,</p> <p>6 there's an interpretation issue.</p> <p>7 (Interpreters confer.)</p> <p>8 THE INTERPRETER: The</p> <p>9 interpreter is suggesting, you</p> <p>10 know, discrediting, if I translate</p> <p>11 defamatory as discrediting. Not</p> <p>12 negative, but discrediting, would</p> <p>13 you agree with that? Discrediting.</p> <p>14 A. My response is just one, just</p> <p>15 one single statement does not carry any</p> <p>16 shading, any characteristic.</p> <p>17 Q. Then what is it about what Mr.</p> <p>18 Zalmayev wrote about your affiliation</p> <p>19 with the LDPR that you consider to be</p> <p>20 defamatory?</p> <p>21 A. It is very simple. Mr.</p> <p>22 Zalmayev wrote that I am, myself, I am an</p> <p>23 anti-Semite, that I participated in the</p> <p>24 theft of the monies in Chechnya. If we</p> <p>25 take the text and we go along that text,</p>
<p style="text-align: right;">Page 117</p> <p>1 ASHOT EGIАЗARYAN</p> <p>2 start of tape 3 in the deposition</p> <p>3 of Ashot Egiазaryan. The time is</p> <p>4 3:31 p.m., we're back on the</p> <p>5 record.</p> <p>6 Q. Mr. Egiазaryan, is it</p> <p>7 defamatory for somebody to write that you</p> <p>8 are affiliated with the LDPR?</p> <p>9 MR. LUPKIN: Objection; calls</p> <p>10 for a legal conclusion. But you</p> <p>11 may answer.</p> <p>12 A. My response is depending on</p> <p>13 what is written about it.</p> <p>14 Q. Well, when you say what is</p> <p>15 written about it, what do you mean?</p> <p>16 A. Well, what you're asking me</p> <p>17 about.</p> <p>18 Q. If somebody wrote that Ashot</p> <p>19 Egiазaryan is affiliated with the LDPR,</p> <p>20 do you consider that to be defamatory?</p> <p>21 MR. LUPKIN: Same objection.</p> <p>22 You may answer.</p> <p>23 A. What I think you mean?</p> <p>24 Q. Yes.</p> <p>25 A. My response is it all depends</p>	<p style="text-align: right;">Page 119</p> <p>1 ASHOT EGIАЗARYAN</p> <p>2 then it would be clearer as we discuss</p> <p>3 the items of the text.</p> <p>4 Q. Is it defamatory to write that</p> <p>5 you're a member of the LDPR?</p> <p>6 A. I think I have given you my</p> <p>7 response. I can repeat it.</p> <p>8 Q. So do you consider for these</p> <p>9 purposes member to be equivalent to</p> <p>10 affiliation?</p> <p>11 A. I don't think so.</p> <p>12 Q. What is --</p> <p>13 A. Because, because to be a</p> <p>14 member of a party means to share and</p> <p>15 carry out the provisions and the by-laws</p> <p>16 of the party, of the statute of the</p> <p>17 party, follow the statute of the party.</p> <p>18 But as for me, I haven't even read it.</p> <p>19 Q. So then are you saying that it</p> <p>20 is defamatory for someone to write that</p> <p>21 you're a member of the LDPR?</p> <p>22 A. For some person, well</p> <p>23 depending for what person. It depends on</p> <p>24 the person.</p> <p>25 Q. The person who's writing it,</p>

29 (Pages 116 to 119)

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<p>1 ASHOT EGIAZARYAN</p> <p>2 is that what you mean?</p> <p>3 A. Well, depending on the person</p> <p>4 who writes, what that person is.</p> <p>5 Q. Can you explain that?</p> <p>6 A. Yes, it seems rather simple.</p> <p>7 Using usual words, if a person is normal,</p> <p>8 a good person, useful to the society, he</p> <p>9 is well known as a positive person, the</p> <p>10 attitude of the, the public attitude is</p> <p>11 positive towards him, so that means it's</p> <p>12 normal, it's regular.</p> <p>13 If a person is not such a</p> <p>14 person, if he shares the, if he approves</p> <p>15 of the by-laws of the statute, of the</p> <p>16 positions of the party, for example, I do</p> <p>17 not share, I do not support the -- well</p> <p>18 that means for me it is, it means bad.</p> <p>19 MR. GOLDEN: Mark this next,</p> <p>20 please as Exhibit 142.</p> <p>21 (Exhibit 142 for</p> <p>22 identification, six-page article.)</p> <p>23 MR. LUPKIN: This is a</p> <p>24 six-page article, Jim, I just want</p> <p>25 to make sure we have all the pages?</p>	<p>1 ASHOT EGIAZARYAN</p> <p>2 English.</p> <p>3 THE INTERPRETER: "The cost of</p> <p>4 a deputy mandate in the new state</p> <p>5 Duma will reach \$5 million. We are</p> <p>6 on the insert of 2007. It is not</p> <p>7 just another year, it is the year</p> <p>8 that concludes the political</p> <p>9 four-year period. In 2007, we're</p> <p>10 going to have elections into the</p> <p>11 Russian Parliament."</p> <p>12 Q. Mr. Egiazaryan, would you</p> <p>13 please read the first paragraph to</p> <p>14 yourself.</p> <p>15 A. You mean verbally, orally?</p> <p>16 Q. No, silently.</p> <p>17 A. I've read it.</p> <p>18 Q. Does the first paragraph say</p> <p>19 that seats in The Duma are available to</p> <p>20 be purchased?</p> <p>21 A. It is written so in the first</p> <p>22 paragraph.</p> <p>23 Q. And does it say in the first</p> <p>24 paragraph that for 2007 the writer thinks</p> <p>25 that it will cost as much as 5 million US</p>
Page 121	Page 123
<p>1 ASHOT EGIAZARYAN</p> <p>2 MR. GOLDEN: It is six pages.</p> <p>3 Q. Mr. Egiazaryan, Exhibit 142 is</p> <p>4 a six page article that is in Russian.</p> <p>5 In the upper left-hand corner there is a</p> <p>6 date. Is that date the 26th of December</p> <p>7 2006?</p> <p>8 A. It's written so here.</p> <p>9 Q. This is an article that I had</p> <p>10 sent to your lawyers I think on Monday so</p> <p>11 that you could read it before the</p> <p>12 deposition. Did you read this article</p> <p>13 before today?</p> <p>14 A. No.</p> <p>15 Q. What is the title of the</p> <p>16 article?</p> <p>17 A. The title of this article is</p> <p>18 "Money in the morning the Parliament seat</p> <p>19 in the evening." The author is Gorevoi,</p> <p>20 G-o-r-e-v-o-i.</p> <p>21 Q. Do you know who that is?</p> <p>22 A. No, I don't.</p> <p>23 MR. GOLDEN: Mr. Translator,</p> <p>24 would you please read, translate</p> <p>25 the first paragraph from Russian to</p>	<p>1 ASHOT EGIAZARYAN</p> <p>2 dollars to purchase a seat in The Duma?</p> <p>3 A. Yes, on the paper, the author</p> <p>4 writes so, probably so.</p> <p>5 Q. Have you ever heard before</p> <p>6 today the belief that deputy seats in The</p> <p>7 Duma are available to be purchased?</p> <p>8 A. I have.</p> <p>9 Q. When was the first time you</p> <p>10 heard that?</p> <p>11 A. I cannot tell you because I've</p> <p>12 been in The Duma since 1990 -- well, for</p> <p>13 a long time, and The Duma has been</p> <p>14 functioning since 1991, and from that</p> <p>15 period I've just heard it.</p> <p>16 Q. When you say "from that period</p> <p>17 I've just heard it," what do you mean?</p> <p>18 A. All these talks are being</p> <p>19 conducted, held on this issue since the</p> <p>20 existence of the, of The Duma.</p> <p>21 Q. Is the view that deputy seats</p> <p>22 in The Duma are available for purchase</p> <p>23 widely, widely held in Russia?</p> <p>24 MR. LUPKIN: Objection to</p> <p>25 form. You may answer.</p>

30 (Pages 120 to 123)

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<p style="text-align: right;">Page 124</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 A. I cannot comment whether it's</p> <p>3 a widespread opinion or not so widespread</p> <p>4 opinion. Each of us can comment on</p> <p>5 behalf of himself. If we, if we, for</p> <p>6 example, ask Grizlov, Grizlov, Grizlov</p> <p>7 former, former chairman of The Duma</p> <p>8 whether he has sold seats in the state</p> <p>9 Duma or not probably he's going to say</p> <p>10 that he has not. And there were many</p> <p>11 articles that seats in the United Russia</p> <p>12 were for sale, were sold.</p> <p>13 Q. So you said there were many</p> <p>14 articles that United Russia sold Duma</p> <p>15 seats, is that what you said?</p> <p>16 A. I have read them, I've seen</p> <p>17 them.</p> <p>18 Q. Did the article say how much</p> <p>19 the cost was for United Russia seats?</p> <p>20 MR. LUPKIN: Objection. In</p> <p>21 what time period?</p> <p>22 Q. The period when you read the</p> <p>23 articles.</p> <p>24 A. You know, various amounts were</p> <p>25 circulating. I don't remember all of</p>	<p style="text-align: right;">Page 126</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 seats.</p> <p>3 The leadership of those</p> <p>4 parties rebuffed those rumors?</p> <p>5 Q. When did you decide to seek a</p> <p>6 seat in The Duma?</p> <p>7 MR. LUPKIN: Just before you</p> <p>8 give an answer, if the answer is</p> <p>9 going to be a year only he can</p> <p>10 answer that question with Mr.</p> <p>11 Muranov in the room. If he's going</p> <p>12 to give details about the</p> <p>13 circumstances, we're going to have</p> <p>14 to go off the record for an</p> <p>15 attorneys' eyes only section.</p> <p>16 MR. GOLDEN: Well first why</p> <p>17 doesn't he -- the question was</p> <p>18 when. So a correct answer to that</p> <p>19 question couldn't possibly be about</p> <p>20 the circumstances.</p> <p>21 MR. LUPKIN: I agree. If</p> <p>22 you'll just give the when.</p> <p>23 A. In 1999.</p> <p>24 MR. GOLDEN: Why are the</p> <p>25 circumstances -- why would the</p>
<p style="text-align: right;">Page 125</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 them. But that was around 3 million.</p> <p>3 Q. What about the other two</p> <p>4 parties, were there articles --</p> <p>5 A. I don't have that article in</p> <p>6 front of me, that's why it's difficult</p> <p>7 for me to comment.</p> <p>8 Q. Did the LDPR sell its Duma</p> <p>9 seats?</p> <p>10 A. To say that one either has to</p> <p>11 be present there or to have heard it from</p> <p>12 somebody who sold them or somebody who</p> <p>13 bought them. Otherwise, it's either just</p> <p>14 rumors or libel.</p> <p>15 Personally, I was not present</p> <p>16 at analogous situations.</p> <p>17 Q. Did you ever hear --</p> <p>18 A. That's why I cannot confirm it</p> <p>19 or cannot rebuff it.</p> <p>20 Q. Did you ever hear rumors that</p> <p>21 the LDPR sold its Duma seats?</p> <p>22 A. I heard rumors -- I heard</p> <p>23 rumors about all the parties and I read</p> <p>24 things in the internet that all of them</p> <p>25 had had sold, some people said they sold</p>	<p style="text-align: right;">Page 127</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 circumstances be subject to an</p> <p>3 attorneys' eyes only examination?</p> <p>4 MR. LUPKIN: I'm happy to</p> <p>5 discuss that with you but without</p> <p>6 Mr. Muranov in the room.</p> <p>7 MR. GOLDEN: Would you excuse</p> <p>8 us for a few minutes.</p> <p>9 (At this time, Mr. Muranov</p> <p>10 left the deposition room.)</p> <p>11 MR. GOLDEN: Ryan, why don't</p> <p>12 you turn the video off.</p> <p>13 THE VIDEOGRAPHER: The time is</p> <p>14 3:51 p.m., we're off the video</p> <p>15 record.</p> <p>16 (Discussion off the record.)</p> <p>17 (The following testimony was</p> <p>18 designated confidential, attorneys'</p> <p>19 eyes only:)</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

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1 ASHOT EGIAZARYAN
2 (At this time, Mr. Muranov
3 returned to the deposition room.)

4 THE VIDEOGRAPHER: The time is
5 4:55 p.m., we're back on the
6 record.

7 Q. Mr. Egiazaryan, who is Dmitry
8 Garkusha?

9 A. This is an employee of ~~Dekmus~~,
10 the company called ~~Dekmus~~. ~~D-e-k-m-u-s~~
11 guess. Prior to that he worked for
12 companies that I owned. He was a former,
13 my employee, director of my companies.

14 Q. Which companies of yours did
15 he work for?

16 A. I cannot list all the
17 companies, but the main companies was
18 Dayev, D-a-y-e-v, Plaza, that was the
19 name of the company. It was a number of
20 companies, the ~~Ross Neft-Gas~~, ~~Ross~~ *Rosneftegaz*
21 ~~Neft-Gas~~. He was the *Rosneftegaz*
22 director of several companies. ~~Ross~~
23 ~~Neft-Gas~~ is not the one that is called
24 ~~Ross Neft~~, it's just simply two companies
25 that have similar names.

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1 ASHOT EGIAZARYAN

2 Q. In what year did he first work
3 for one of your companies?

4 A. I met him in 1996.

5 Q. Is that when he started to
6 work for one of your companies?

7 A. I cannot tell you exactly. It
8 was almost like 16, 18 years ago, I
9 cannot remember the exact year.

10 Q. Does he work for one of your
11 companies today?

12 A. No, he does not.

13 Q. When is the last time he
14 worked for one of your companies?

15 A. In 2008. He resigned in 2008.

16 Q. At that point was he working
17 for more than one of your companies, or
18 just one?

19 A. I cannot tell you exactly for
20 which companies he worked because many,
21 many of the companies were offshore
22 companies. I can tell you -- there was a
23 number of offshore companies. I can tell
24 you exactly that he was the general *DecMos*
25 director of ~~Dekmus~~, ~~Dekmus~~, that was the *DecMos*

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1 ASHOT EGIAZARYAN

2 main company. That's the company that
3 handled, that handled the project of
4 refurbishing or recreation of the Moskva
5 Hotel.

6 Q. What offshore companies of
7 yours was he involved with?

8 A. He participated in the
9 companies, in the many companies. Not
10 many companies, but those companies that
11 participated in the Hotel Moscow project
12 he, the companies that took credits at
13 banks, opened up accounts, organized
14 those companies, formed those companies
15 at my request.

16 Q. What were the names of the
17 companies?

18 *Hackham* I listed at the beginning,
19 ~~Heckam~~, ~~Blindensee~~, maybe some other
20 companies. The thing is that I was not
21 engaged. I was not handling the
22 technical issues. I entrusted those
23 issues to managers. He was the general
24 director.

25 MR. LUPKIN: Just I want --

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1 ASHOT EGIAZARYAN

2 no, let him finish the answer, I
3 just want to --

4 A. That's why I did not monitor
5 the actions of the companies.

6 MR. LUPKIN: I just wanted to
7 say we did not when we got back on
8 the record make a notation that we
9 are no longer in an attorneys' eyes
10 only context and I just for the
11 sake of clarity just wanted to make
12 that clear from the -- you have it.
13 Great, thank you.

14 Q. Mr. Egiazaryan, was Mr.
15 Garkusha an investor in any of your
16 projects?

17 A. No.

18 Q. Did he tell you why he
19 resigned?

20 A. Yes.

21 Q. What did he say?

22 A. Well, he did not say anything,
23 it was my initiative.

24 Q. Did you fire him?

25 A. I was the initiator of his

32 (Pages 150 to 153)

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1 ASHOT EGIАЗARYAN

2 firing.

3 Q. Why did you fire him?

4 A. Because embezzlement of monies
5 that belonged to the project was
6 unveiled, this is number 1. This was the
7 first, and in my opinion, quite
8 substantial argument for firing.

9 And the second was the
10 conflict of interest in the organizations
11 which had been created by him and at
12 which he worked at the same time.

13 Q. How much --

14 A. He created -- Deutsche Bank
15 was the creditor of the Moscow project,
16 of the Moscow Hotel project. That is
17 normal. ~~Shtrabok~~, it's a construction *Strabag*
18 company, a large construction company,
19 S-h-t-r-a-b-o-k. Their capital was
20 around 5 billion Euros. It was the
21 client that performed the construction,
22 that performed that.

23 So on the one hand, the
24 creditor is Deutsche Bank. On the other
25 hand, the constructor, the construction

1 *Strabag* ASHOT EGIАЗARYAN

2 company is ~~Shtrabok~~. The director of
3 ~~Dekmus~~ was Garkusha. And then it -- and
4 then we discovered that Garkusha formed a
5 joint venture, that's 50/50 by 50 between
6 ~~Shtrabok~~ and Deutsche Bank, which was
7 again called Deutsche Bank Development
8 and becomes the general director of that
9 company. And at the same time he is
10 director of ~~Dekmus~~. Now we're having
11 here a conflict of interest.

12 Q. What was the --

13 A. In my opinion I thought it was
14 ~~unacceptable~~ *unacceptable*. So on one hand, he was the
15 financier and also the client and he was
16 the one who accepted the jobs and the one
17 who financed the jobs and fulfilled the
18 jobs all in one person. *unacceptable*

19 It was ~~inadmissible~~ because at
20 the same time he fulfilled the interests
21 of three organizations that competed with
22 each other. The organizations that had
23 their own interests which were
24 contradictory to the interests of others.

25 Q. Tell me again --

1 ASHOT EGIАЗARYAN

2 A. This was the foundation.

3 Well, that's my response to your question
4 why I initiated his firing.

5 Q. Tell me again about the
6 company that he formed with Deutsche
7 Bank?

8 A. Deutsche Bank Development.

9 Q. And you said that Deutsche
10 Bank was a 50 percent owner and Garkusha
11 was a 50 percent owner?

12 A. The previous question maybe I
13 did not give you the exact answer maybe,
14 there was some misunderstanding. What
15 was the previous question before that?

16 (Record read as requested.)

17 *Strabag* Between Deutsche Bank and
18 ~~Shtrabok~~, as far as I know, Deutsche Bank
19 had 49 percent of the interest in that *Strabag*
20 company, ~~Shtrabok~~ 49 percent, and
21 Garkusha 2 percent. Well Garkusha, he
22 created such a scheme that he was
23 balancing between Deutsche Bank and
24 ~~Shtrabok~~. *Strabag*.

25 Q. What did Deutsche Bank

1 ASHOT EGIАЗARYAN
2 Development Company do?

3 A. As they say in English, zero.
4 As you have it in the casino, zero.

5 Q. How much --

6 A. Nothing.

7 Q. How much money did --

8 MR. LUPKIN: I think he's got
9 to translate.

10 MR. GOLDEN: Sorry.

11 A. As far as my understanding was
12 that company had been created with one
13 purpose only, to facilitate the creation
14 of such a situation at which they could
15 steal the project from me.

16 Q. How do you know that they, the
17 company was formed to steal the project
18 from you?

19 A. This is my absolute subjective
20 opinion which found its confirmation in
21 Garkusha's subsequent behavior.

22 Q. You said he embezzled money.
23 How much money did he embezzle?

24 A. In my opinion, a lot of money,
25 approximately around \$2 million.

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1 ASHOT EGIАЗARYAN

2 Q. How did you learn about it?

3 A. I learned about it and then
4 among other things, the confirmation from
5 the ~~Shtabok~~ company. There were other
6 sources, but he took bribes from
7 ~~Shtabok~~. *Strabag*8 Q. Is that the embezzlement, that
9 he took bribes?10 A. Well, I didn't finish my
11 response. I wanted to explain it to you.12 *DecMos* If the general director of
13 ~~Dekmus~~ receives money for the fulfillment
14 of some jobs, has a client, and the
15 owners know nothing about it naturally,
16 well, in -- well, under my own
17 understanding there's a bribe or in
18 Russian we call it kickoffs -- I'm sorry,
19 kickbacks. I cannot call it a different
20 way.21 Q. Before when you said he
22 embezzled, were you thinking of him
23 taking these bribes?24 A. Well, I think it is
25 embezzlement.

1 ASHOT EGIАЗARYAN

2 MR. LUPKIN: Objection to
3 form, physical evidence. You may
4 answer.5 A. Yes, I was shown documents,
6 including ~~Shtabok~~ themselves. *Strabag*7 Q. What did ~~Shtabok~~ show you? *Strabag*

8 A. Those were payment documents.

9 Q. Payment to Garkusha?

10 A. Yes.

11 Q. Do you have those documents
12 today?13 A. I had those documents in
14 Russia. Perhaps they should be in the
15 archives.

16 Q. When you say --

17 A. These documents were shown to
18 Garkusha. He saw them also.19 Q. But you don't have them today,
20 they're in Russia?

21 A. I don't have them with me.

22 Q. Do you have a way to get them?

23 A. I think I can try to get them.

24 I can tell.

25 Q. Who is Igor Lebedev?

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Page 161

1 ASHOT EGIАЗARYAN *Strabag*2 Q. So ~~Shtabok~~, did ~~Shtabok~~ get
3 something for the bribes that ~~Shtabok~~
4 gave to Garkusha? *Strabag*5 A. ~~Shtabok~~ made payments.6 Q. And what did ~~Shtabok~~ get for
7 the payments? *Strabag*8 A. The closure of construction
9 orders.10 Q. Can you explain what you mean
11 by the closure of construction orders?

12 A. Yes, I can.

13 Q. Please do that.

14 A. ~~Shtabok~~ had done jobs to the
15 tune of a certain amount of money. They
16 sent their bills for those jobs. ~~Dekmus~~ *DecMos*
17 is supposed to make payment, pay those
18 bills. ~~Dekmus~~ pays the bills, ~~Shtabok~~
19 receives money, the certain percentage
20 goes back to the general director who had
21 made that payment. I think this is
22 stealing money.23 Q. Other than ~~Shtabok~~ telling
24 you about this, did you discover any
25 physical evidence?

1 ASHOT EGIАЗARYAN

2 A. One Igor Lebedev who I know is
3 Zhirinovsky's son.4 Q. Did you ever give Igor Lebedev
5 cash for LDPR?6 THE INTERPRETER: I'm sorry,
7 what was your last, cash?

8 MR. GOLDEN: Cash.

9 THE INTERPRETER: For the --

10 MR. GOLDEN: For the LDPR.

11 A. No.

12 Q. Did you ever tell -- did you
13 ever tell Garkusha that you gave Igor
14 Lebedev money?

15 A. No.

16 Q. Who is Andrey Gloriozov?

17 THE INTERPRETER: Say it
18 again, please.

19 Q. Andrey Gloriozov?

20 A. It is my acquaintance. To
21 some degree it is my employee.22 Q. When was he first your
23 employee?

24 A. Sometime in 1996.

25 Q. What did he first do for you?

34 (Pages 158 to 161)

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1 **ASHOT EGIAZARYAN**
2 A. He had contacts with foreign
3 banks. He opened up companies, then he
4 handled those companies, then he opened
5 up bank accounts for these companies. He
6 managed their assets.
7 **Q. Does he still do that for you**
8 **today?**
9 A. Yes.
10 **Q. Can you say approximately how**
11 **much money you gave him between 1996 and**
12 **today to manage for you?**
13 A. I can tell you, but this is
14 going to be very, very approximately.
15 **Q. Yes, approximately is fine.**
16 A. Around 60 million.
17 **Q. Where did you get the 60**
18 **million that you gave to him?**
19 MR. LUPKIN: Objection to
20 form. Note my objection to form.
21 You may answer.
22 A. In the nineties I was working
23 in businesses. I was handling
24 businesses. In the nineties.
25 **Q. Do you remember which**

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1 **ASHOT EGIAZARYAN**
2 **businesses produced \$60 million for you?**
3 A. Yes, I had financial
4 businesses, businesses related to
5 regulating financial obligations,
6 financial debts.
7 **Q. Were there people like -- were**
8 **there people other than Andrey Gloriov**
9 **who performed a similar service for you?**
10 A. Mainly Andrey performed such
11 services. Maybe somebody performed some
12 smaller services, but mainly those
13 services were done by Andrey. The thing
14 is that those were the nineties, you
15 know, 15 years ago, difficult for me to
16 recall but the money that Andrey handled
17 at that time there was a default and
18 there were great losses. Some large
19 amounts were just, just lost due to the
20 populations with bonds of the
21 Vneshekonombank. I remember some \$40
22 million was lost.
23 **Q. Do you remember when the \$40**
24 **million was lost?**
25 A. Approximately during that

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1 **ASHOT EGIAZARYAN**
2 period of time, the end of the second
3 half of the nineties.
4 MR. LUPKIN: Excuse me, before
5 you ask the next question, we've
6 lost the real time feed. I don't
7 know how long it's going to take to
8 fix it, but I don't want to disrupt
9 the examination, I wanted to just
10 alert you to that fact. If it's
11 something that could be fixed
12 rather quickly at the next break.
13 Could we go off the record briefly.
14 THE VIDEOGRAPHER: This will
15 end tape 3 in the deposition of
16 Ashot Egiazaryan. The time is
17 5:24, off the record.
18 (A recess was taken.)
19 THE VIDEOGRAPHER: This is the
20 start of tape 4 in the deposition
21 of Ashot Egiazaryan. The time is
22 5:35 p.m., we're on the record.
23 MR. GOLDEN: Please mark this
24 next.
25 (Exhibit 143 for

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1 **ASHOT EGIAZARYAN**
2 identification, Bates stamped PZ
3 001084 through 1092.)
4 **Q. Mr. Egiazaryan, Exhibit 143 is**
5 **a declaration by Andrey Gloriov and**
6 **documents attached in reference to the**
7 **declaration. Have you seen this before?**
8 A. Yes.
9 **Q. Do you recognize Andrey**
10 **Gloriov's signature?**
11 A. You see, simply I don't
12 remember his signature, so that I could
13 recognize it or not recognize it.
14 MR. GOLDEN: Mr. Translator,
15 would you please read paragraph
16 number 2.
17 (At this time, the requested
18 material was read to the witness.)
19 A. Well the year is incorrect
20 here.
21 **Q. Other than the year, is it an**
22 **accurate statement?**
23 A. Yes.
24 **Q. And the correct year you say**
25 **is 1996?**

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<p style="text-align: right;">Page 166</p> <p>1 ASHOT EGIАЗARYAN</p> <p>2 A. Yes.</p> <p>3 Q. Why did you ask Mr. Gloriov</p> <p>4 to act as the named owner of offshore</p> <p>5 companies when they were actually owned</p> <p>6 by you?</p> <p>7 A. Because we needed a person who</p> <p>8 would handle this, in this direction who</p> <p>9 would handle international financial</p> <p>10 consulting. Andrey Gloriov knows</p> <p>11 English and French very well. And in</p> <p>12 practice he performed the functions of a</p> <p>13 trustee which was not in contradiction</p> <p>14 with the law and he possessed a certain</p> <p>15 degree of trust on my part. And that is</p> <p>16 why he produced the impression of a well</p> <p>17 educated and professional specialist on</p> <p>18 me.</p> <p>19 Before that he was the manager</p> <p>20 of a large Russian bank, which was called</p> <p>21 Imperial. After that, he was the manager</p> <p>22 of the state bank, Sovzaganbank,</p> <p>23 S-o-v-z-a-g-r-a-n-b-a-n-k, which</p> <p>24 testifies about his professionalism.</p> <p>25 Q. What is the company Gascony</p>	<p style="text-align: right;">Page 168</p> <p>1 ASHOT EGIАЗARYAN</p> <p>2 witness about this paragraph that</p> <p>3 it be translated for him.</p> <p>4 MR. GOLDEN: Mr. Translator,</p> <p>5 would you read paragraph 3, please.</p> <p>6 (At this time, the requested</p> <p>7 material was read to the witness.)</p> <p>8 Q. So do you see that Mr.</p> <p>9 Gloriov describes transferring \$20</p> <p>10 million?</p> <p>11 MR. LUPKIN: Objection to</p> <p>12 form. You may answer.</p> <p>13 A. Yes, I've heard it.</p> <p>14 Q. And he says in paragraph 3</p> <p>15 that the \$20 million was your money. Was</p> <p>16 it your money?</p> <p>17 A. Yes.</p> <p>18 Q. Was that part of the \$60</p> <p>19 million that you described a few minutes</p> <p>20 ago?</p> <p>21 A. I'm finding it difficult today</p> <p>22 to follow up and to see whether it was</p> <p>23 part of that or what was part of this</p> <p>24 after such time. I think probably it is</p> <p>25 much simpler to request this information</p>
<p style="text-align: right;">Page 167</p> <p>1 ASHOT EGIАЗARYAN</p> <p>2 limited?</p> <p>3 A. I remember that company was</p> <p>4 mentioned. It was one of the companies.</p> <p>5 I cannot tell you exactly how these</p> <p>6 companies operated, but there was such a</p> <p>7 company.</p> <p>8 Q. What is the company Cavali</p> <p>9 Foundation?</p> <p>10 A. The same.</p> <p>11 Q. Did you arrange for Gascony</p> <p>12 and Cavali to possess \$20 million that</p> <p>13 were yours?</p> <p>14 MR. LUPKIN: Hold on a second.</p> <p>15 Can I have the question back again.</p> <p>16 (Record read as requested.)</p> <p>17 MR. LUPKIN: Go ahead, you can</p> <p>18 answer.</p> <p>19 A. I did not do that.</p> <p>20 Q. Do you know how Gascony and</p> <p>21 Cavali got the \$20 million that Mr.</p> <p>22 Gloriov is describing?</p> <p>23 MR. LUPKIN: Objection; lacks</p> <p>24 foundation. I would also ask if</p> <p>25 you are going to be questioning the</p>	<p style="text-align: right;">Page 169</p> <p>1 ASHOT EGIАЗARYAN</p> <p>2 from Gloriov and get the response.</p> <p>3 Because I cannot judge by the names of</p> <p>4 the companies which companies he formed</p> <p>5 and which companies he had kept the</p> <p>6 money. He did not furnish me accounts</p> <p>7 thereof.</p> <p>8 Q. Did you keep track of the</p> <p>9 money that you gave to Mr. Gloriov to</p> <p>10 handle?</p> <p>11 A. Yes, I counted the money of</p> <p>12 course.</p> <p>13 Q. Where did you keep the records</p> <p>14 of the money that you gave to Mr.</p> <p>15 Gloriov?</p> <p>16 A. At that time I had it, but now</p> <p>17 I don't think I've kept it.</p> <p>18 Q. Where did you have it when you</p> <p>19 had it?</p> <p>20 A. Well, I kept it in my archives</p> <p>21 in Russia.</p> <p>22 Q. Do you think that's where it</p> <p>23 is today?</p> <p>24 A. Maybe.</p> <p>25 Q. Did Mr. Gloriov give you</p>

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<p style="text-align: right;">Page 170</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 regular reports about the money he was</p> <p>3 handling for you?</p> <p>4 A. Not regular reports, but from</p> <p>5 time to time.</p> <p>6 Q. Did Mr. Gloriov work for you</p> <p>7 at Unikombank? while you were there?</p> <p>8 A. He did.</p> <p>9 Q. For how long?</p> <p>10 A. Probably for a year, a year</p> <p>11 and a half. I cannot tell you exact.</p> <p>12 Approximately that time.</p> <p>13 Q. Do Duma deputies have to file</p> <p>14 financial reports with The Duma?</p> <p>15 A. Declarations.</p> <p>16 Q. Are the declarations, do the</p> <p>17 declarations contain financial</p> <p>18 information?</p> <p>19 A. Well they are financial</p> <p>20 documents.</p> <p>21 Q. What is your understanding of</p> <p>22 the financial documents that deputies,</p> <p>23 that Duma deputies are supposed to file?</p> <p>24 MR. LUPKIN: Objection to</p> <p>25 form. You may answer.</p>	<p style="text-align: right;">Page 172</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 form. You may answer.</p> <p>3 A. Yes, I think received for the</p> <p>4 period in question.</p> <p>5 Q. What do you mean received for</p> <p>6 the period in question?</p> <p>7 A. Well do you want me to give</p> <p>8 you an example or how do you want me to</p> <p>9 explain it?</p> <p>10 Q. When you say received, do you</p> <p>11 mean that if the money was received or</p> <p>12 the asset was received in a previous year</p> <p>13 you don't have to report it?</p> <p>14 MR. LUPKIN: Objection; calls</p> <p>15 for a legal conclusion about</p> <p>16 Russian law. But you may answer</p> <p>17 the question.</p> <p>18 A. Naturally, if a member of The</p> <p>19 Duma who is supposed to show his</p> <p>20 financial declaration, he earned that</p> <p>21 money during the past year he is supposed</p> <p>22 to show it in his declaration. I'm not</p> <p>23 talking about the operations of companies</p> <p>24 but actually the monies that he, that he</p> <p>25 personally received as dividends. But</p>
<p style="text-align: right;">Page 171</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 A. Very simple. Well, how much</p> <p>3 money one has made for the year, for the</p> <p>4 past year, well, one has to show all</p> <p>5 that, personally, how much money</p> <p>6 personally received by that specific</p> <p>7 person and that person has to show that</p> <p>8 amount.</p> <p>9 Q. In addition to showing in the</p> <p>10 reports how much money a person has made,</p> <p>11 do the reports also show The Duma</p> <p>12 deputies' assets?</p> <p>13 MR. LUPKIN: Objection to</p> <p>14 form. You may answer.</p> <p>15 A. Well, he has to show what</p> <p>16 assets he owns and what assets he</p> <p>17 physically received in his, in his name,</p> <p>18 and specifically, for example, an</p> <p>19 apartment, cars, movable or fixed</p> <p>20 property he has, that he has earned for</p> <p>21 the past, for the past year.</p> <p>22 Q. Is it your understanding that</p> <p>23 the reports are supposed to include all</p> <p>24 The Duma deputies' assets?</p> <p>25 MR. LUPKIN: Objection to</p>	<p style="text-align: right;">Page 173</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 he's not supposed to show, but he's not</p> <p>3 supposed to show this same money for each</p> <p>4 year from year to year according to the</p> <p>5 Russian laws.</p> <p>6 Q. Mr. Egiazaryan, do you have a</p> <p>7 Ph.D.?</p> <p>8 A. Yes.</p> <p>9 Q. What subject?</p> <p>10 A. Investment field.</p> <p>11 Q. Does the field of the Ph.D.</p> <p>12 have a name?</p> <p>13 A. Economics.</p> <p>14 Q. Do you have an understanding</p> <p>15 about whether a Ph.D. in Russia is</p> <p>16 comparable to a Ph.D. in the United</p> <p>17 States?</p> <p>18 A. In Russia this degree is</p> <p>19 called a candidate of economic sciences.</p> <p>20 Probably, probably as I think, it</p> <p>21 corresponds to the analogous Ph.D.</p> <p>22 Q. To you, what is an income</p> <p>23 statement?</p> <p>24 A. According to the Russian laws,</p> <p>25 an income statement is the way I</p>

37 (Pages 170 to 173)

<p style="text-align: right;">Page 174</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 understand income that was received after</p> <p>3 taxes, after payment of corresponding</p> <p>4 taxes was made. Well, it differs a</p> <p>5 little bit from the American</p> <p>6 understanding or maybe there's a</p> <p>7 principle difference between the American</p> <p>8 and the Russian notion. Well, various</p> <p>9 countries have various laws.</p> <p>10 Q. To you as a Ph.D. economist,</p> <p>11 what is an income statement?</p> <p>12 MR. LUPKIN: Objection; asked</p> <p>13 and answered. You may answer it</p> <p>14 again.</p> <p>15 A. According to the understanding</p> <p>16 of a Russian physical personality this is</p> <p>17 a sum, an amount, financial amount</p> <p>18 obtained, received by the physical</p> <p>19 personality after paying all taxes. This</p> <p>20 is the income of a physical personality.</p> <p>21 Q. To you as a Ph.D. economist,</p> <p>22 what is a balance sheet?</p> <p>23 A. Well, I am a Ph.D. in</p> <p>24 economics, I'm not an accountant. I am a</p> <p>25 teacher, a lecturer in political economy.</p>	<p style="text-align: right;">Page 176</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 at the separate accounting department,</p> <p>3 which was not my specialty. It's a</p> <p>4 separate, huge volume of knowledge,</p> <p>5 education.</p> <p>6 Q. You mentioned before lists,</p> <p>7 like the Forbes 400, of Russians. What</p> <p>8 is shown on that list?</p> <p>9 A. I did not say Forbes 400.</p> <p>10 Q. You mentioned, you mentioned</p> <p>11 the list in Russia of the oligarchs. Do</p> <p>12 you remember that?</p> <p>13 A. I mentioned Forbes, but I did</p> <p>14 not say Forbes 400.</p> <p>15 Q. On the list that you</p> <p>16 mentioned, what is shown for each of</p> <p>17 these people?</p> <p>18 MR. LUPKIN: Objection to</p> <p>19 form. You may answer.</p> <p>20 A. As far as I can remember, they</p> <p>21 showed ratings, which rating a specific</p> <p>22 person occupies, and what assets he has.</p> <p>23 MR. VESLER: His net worth.</p> <p>24 A. But those assets they are</p> <p>25 taken approximate, it is an approximation</p>
<p style="text-align: right;">Page 175</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 Well this is the specific field of</p> <p>3 accounting which I never handled, and I</p> <p>4 do not know it and I'm not supposed to</p> <p>5 know it.</p> <p>6 Q. To you as a businessman, what</p> <p>7 is a balance sheet?</p> <p>8 A. Well, it's nothing to me</p> <p>9 because I've not studied it.</p> <p>10 Q. Did you ever prepare or have</p> <p>11 somebody prepare for you balance sheets</p> <p>12 for any of your businesses?</p> <p>13 A. Well, specialists and experts</p> <p>14 who were paid for that have prepared</p> <p>15 balance sheets, balance reports for me</p> <p>16 that were submitted to the IRS tax authorities.</p> <p>17 THE INTERPRETER: I said</p> <p>18 taxation authorities. I said in</p> <p>19 America it's IRS, it's called IRS.</p> <p>20 A. Corresponding accounting firms</p> <p>21 are retained who prepare corresponding</p> <p>22 accounting reports. My major, my main</p> <p>23 specialty is teaching political economy.</p> <p>24 The analysis of accounting reports was a</p> <p>25 separate major, was a separate specialty</p>	<p style="text-align: right;">Page 177</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 of the amounts. I don't think it is</p> <p>3 always related to the reality. For</p> <p>4 example, for example, they write that</p> <p>5 this or that person owns this or that</p> <p>6 plant and that plant is worth a million</p> <p>7 dollars. But in reality, if he tries to</p> <p>8 sell that plant, well, he may probably</p> <p>9 not sell it even for a thousand -- for a</p> <p>10 hundred thousand dollars.</p> <p>11 Q. For these Duma reports, the</p> <p>12 financial declarations, were you supposed</p> <p>13 to disclose annual income or your assets?</p> <p>14 A. As far as I understand, one</p> <p>15 had to show the annual income as well as</p> <p>16 -- as far as I was consulted by my</p> <p>17 lawyers and accountants, I was supposed</p> <p>18 to, just like any other member of the</p> <p>19 Duma, to show the assets that were</p> <p>20 registered in my, directly in my name, or</p> <p>21 in the name of any other member of the</p> <p>22 Duma.</p> <p>23 Q. And when you say --</p> <p>24 A. As far as I know in Russia,</p> <p>25 according to the Russian laws, there is</p>

38 (Pages 174 to 177)

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<p>1 ASHOT EGIAZARYAN</p> <p>2 no understanding of the beneficiary</p> <p>3 ownership, beneficiary property.</p> <p>4 Q. Did you list --</p> <p>5 A. In other words, using just</p> <p>6 simple words, if a person owns property</p> <p>7 and it is registered directly in his</p> <p>8 name, in this case, he's supposed, he's</p> <p>9 obligated to declare that.</p> <p>10 Q. In --</p> <p>11 A. Well this situation as far as</p> <p>12 I understand differs from foreign laws.</p> <p>13 Q. Mr. Egiazaryan, you've</p> <p>14 answered the question, thank you.</p> <p>15 MR. LUPKIN: Are you finished</p> <p>16 with your answer?</p> <p>17 THE WITNESS: No.</p> <p>18 MR. LUPKIN: Please let him</p> <p>19 finish answering.</p> <p>20 MR. GOLDEN: He stopped</p> <p>21 answering this question five</p> <p>22 minutes ago and he's just going on</p> <p>23 to kill time. I'm going to</p> <p>24 interrupt him and ask a question.</p> <p>25 MR. LUPKIN: He's answering</p>	<p>1 ASHOT EGIAZARYAN</p> <p>2 witness is answering the question</p> <p>3 as he sees appropriate to answer</p> <p>4 the question and you'll either</p> <p>5 accept the answer or you won't</p> <p>6 accept the answer. I am not</p> <p>7 controlling the witness' questions,</p> <p>8 you're not controlling -- the</p> <p>9 witness' answers rather, you're not</p> <p>10 controlling the witness' answers.</p> <p>11 I'm sorry that you're unhappy with</p> <p>12 it, let's please move on, I'd like</p> <p>13 the witness to be able to finish</p> <p>14 his answer.</p> <p>15 Q. Do you remember the question?</p> <p>16 A. Naturally.</p> <p>17 Q. Finish your answer.</p> <p>18 A. But if you dislike it, I can</p> <p>19 keep mum.</p> <p>20 Q. Keep what?</p> <p>21 A. Keep mum. I can keep silent.</p> <p>22 Q. Now the \$20 million that's</p> <p>23 referenced in Mr. Gloriov's</p> <p>24 description, was that disclosed in your</p> <p>25 Duma reports?</p>
Page 179	Page 181
<p>1 ASHOT EGIAZARYAN</p> <p>2 the question to the best of his</p> <p>3 ability. I'm sorry that you're</p> <p>4 dissatisfied with it, but the fact</p> <p>5 remains that's what he's doing.</p> <p>6 MR. GOLDEN: The question --</p> <p>7 MR. LUPKIN: Excuse me, I'd</p> <p>8 like him -- let me finish, please.</p> <p>9 I'd like him to be able to finish</p> <p>10 the answer to his question and when</p> <p>11 he's completed it, you may go on.</p> <p>12 MR. GOLDEN: Let me find what</p> <p>13 the question was.</p> <p>14 The question was were you</p> <p>15 supposed to disclose annual income</p> <p>16 or your assets, that was the</p> <p>17 question. Even if he had answered</p> <p>18 it, it wouldn't have taken him ten</p> <p>19 minutes to respond to that</p> <p>20 question. So whatever he's saying</p> <p>21 now is not responsive and I want to</p> <p>22 go on to another question.</p> <p>23 MR. LUPKIN: I'm not going to</p> <p>24 engage in a colloquy with you on</p> <p>25 the record, Mr. Golden. The</p>	<p>1 ASHOT EGIAZARYAN</p> <p>2 MR. LUPKIN: Objection to</p> <p>3 form. You may answer.</p> <p>4 A. I was not supposed to disclose</p> <p>5 it in my declaration that I submitted to</p> <p>6 The Duma according to the Russian laws.</p> <p>7 Q. Did you tell Mr. Gloriov to</p> <p>8 transfer that \$20 million to someone or</p> <p>9 some company in the United States?</p> <p>10 A. Mr. Gloriov told me that he</p> <p>11 had a man with whom he had worked before.</p> <p>12 It was a professional regarding the</p> <p>13 utilization of finances. He had been a</p> <p>14 banker prior to that. On one hand I</p> <p>15 wanted that the money would be handled by</p> <p>16 my cousin Suren. This is my elder</p> <p>17 cousin. He's an economist. According</p> <p>18 his education, he's a candidate of</p> <p>19 economic sciences.</p> <p>20 And naturally, as I trusted</p> <p>21 Suren, agreed to the proposal of Mr.</p> <p>22 Gloriov for the money to be transferred</p> <p>23 so that they would operate, grow in their</p> <p>24 operations to the joint venture where my</p> <p>25 cousin was and who could, of course,</p>

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1 ASHOT EGIAZARYAN
 2 monitor and control that money so that
 3 money would not be stolen.
 4 **Q. Was the --**
 5 A. It's so just like with a
 6 regular bank, when a man brings his money
 7 to the bank which he trusts to keep the
 8 money and to let this money grow, only
 9 banks at that time they offered very
 10 little interest, more interest. And here
 11 there was a realistic opportunity that
 12 money would be increased tremendously.
 13 **Q. Was that man in the United**
 14 **States that Gloriovzov knew, Sergei**
 15 **Ponomarev?**
 16 A. Yes.
 17 **Q. Who was supposed to make the**
 18 **money grow, Mr. Ponomarev or Suren?**
 19 A. As far as my understanding
 20 was, mainly Sergei. So in reality, that
 21 money was in the possession of Andrey
 22 Gloriovzov, although the money was with
 23 Sergei because they were partners.
 24 **Q. How were they supposed to make**
 25 **the money grow?**

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1 ASHOT EGIAZARYAN
 2 A. To make investments in either
 3 profitable projects or bonds.
 4 **Q. Did they do that?**
 5 A. On my part, I made my
 6 recommendations so that they would invest
 7 in some development projects.
 8 **Q. What did they do with the**
 9 **money?**
 10 A. But my recommendations could
 11 be just recommendations.
 12 **Q. What did they do with the**
 13 **money? What did they do with the money?**
 14 MR. LUPKIN: I think there's
 15 an answer that's going to be coming
 16 out in English.
 17 A. Maybe because when I
 18 transferred the money the responsibility
 19 was also transferred to Gloriovzov, to
 20 Ponomarev, to Suren.
 21 **Q. What did they do with the**
 22 **money?**
 23 A. When I found out, when I
 24 learned later on Ponomarev, when he
 25 consulted of course Gloriovzov, they

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1 ASHOT EGIAZARYAN
 2 invested money in bonds.
 3 MR. VESLER: Securities.
 4 A. Securities. When I learned
 5 after that -- when I -- as I learned
 6 later on, they managed to invest monies
 7 in government organizations, and that was
 8 Fannie Mac and Freddie Mac, which had a
 9 negative effect on the monies.
 10 **Q. Where are the records of those**
 11 **investments?**
 12 A. I never had records. They did
 13 not furnish them to me.
 14 **Q. Did Mr. Ponomarev and Suren**
 15 **file tax returns in the United States**
 16 **about the handling of that money?**
 17 A. I think, and this is my
 18 personal opinion, that they did file
 19 because they couldn't, couldn't do
 20 otherwise.
 21 **Q. Do you know what a promissory**
 22 **note is?**
 23 A. Yes.
 24 **Q. Did you ask Gloriovzov to sign**
 25 **a promissory note in 2011 relating to**

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1 ASHOT EGIAZARYAN
 2 **this \$20 million?**
 3 MR. LUPKIN: Excuse me, can I
 4 have the question back, please.
 5 (Record read as requested.)
 6 MR. LUPKIN: Please go ahead.
 7 A. I remember I had asked
 8 Gloriovzov together with Suren to
 9 originate or to process some documents if
 10 there were not enough documents or if
 11 some documents had been lost. Which
 12 documents specifically I did not discuss
 13 that with Andrey.
 14 **Q. When you said that you asked**
 15 **Gloriovzov and Suren to originate or to**
 16 **process documents, when did you ask them**
 17 **that?**
 18 A. Not with Suren, but at the
 19 request of Suren. Because Suren tried to
 20 find Andrey, reach him on the telephone,
 21 he failed, and he asked me to call
 22 Andrey. After that, they were in
 23 telephone contact and they agreed which
 24 documents they had to process.
 25 **Q. Did you ask them to prepare**

40 (Pages 182 to 185)

<p style="text-align: right;">Page 186</p> <p>1 ASHOT EGIAZARYAN 2 those documents in 2011? 3 A. I did not ask them. I just 4 forwarded Suren's request to Andrey. 5 Q. What was Suren's request? 6 A. Suren's request was in view of 7 the, well, tax audit that was conducted. 8 As far as I can understand, some 9 documents were missing that were either 10 lost or were signed verbally. Some 11 documents that were signed their 12 expiration date, they expired, and it was 13 necessary to prepare some more documents 14 which a lot of time had elapsed, how many 15 years, 14 years or more than 15 years. 16 Q. What tax audit are you 17 referring to? 18 A. The tax audit that was 19 conducted of the, of Suren's company. 20 Q. Which company? 21 A. I cannot tell you which 22 company, I don't know. I was not 23 interested in that. 24 Q. Did you ever know the name of 25 the company?</p>	<p style="text-align: right;">Page 188</p> <p>1 ASHOT EGIAZARYAN 2 wrong about it. 3 Q. Was -- 4 MR. LUPKIN: Excuse me, don't 5 speculate. 6 Q. Was a company -- 7 A. I cannot tell you exactly 8 because I can be mistaken. 9 Q. Was the company involved named 10 Clear Voice? 11 A. I do not know which companies 12 were audited. Because I did not read the 13 auditing requests for these companies. I 14 cannot state. I really was not 15 interested in that. 16 Q. Did Suren tell you that he 17 needed this \$20 million note to respond 18 to the audit? 19 A. You said \$20 million -- 20 MR. LUPKIN: Whoa, whoa, too 21 many things going on. 22 A. There was no such promissory 23 note of \$20 million. 24 Q. When you say there was no 25 promissory note with \$20 million, you</p>
<p style="text-align: right;">Page 187</p> <p>1 ASHOT EGIAZARYAN 2 A. Which one? 3 Q. The name of the company that 4 was being audited? 5 A. No. 6 Q. So Suren -- 7 A. I think it was not one 8 company, there was a group of companies. 9 Q. And do you remember any of the 10 names? 11 A. Yes, I do remember. I do 12 remember all these companies, but which 13 questions, which questions were directed 14 to which company because I did not talk 15 to the auditing offices I cannot give you 16 a correct answer. But there are no 17 secrets about it. 18 Q. Did Suren tell you the name of 19 the company or companies that were being 20 audited? 21 A. Well, I think it was the 22 company, I can tell you approximately. 23 Q. Yes, tell me approximately. 24 A. There was a company that was, 25 had the name SP Capital, but I can be</p>	<p style="text-align: right;">Page 189</p> <p>1 ASHOT EGIAZARYAN 2 mean when the money was first transferred 3 there was no note? 4 A. No, I did not say that. When 5 did I say that? 6 Q. That was my question. 7 A. No, I did not say it, you said 8 that. 9 Q. Did Suren ask you or tell you 10 that he needed a \$20 million promissory 11 note with regard to the audit? 12 A. Well I can repeat what I said. 13 Suren said that some documents were 14 missing that could be lost with time, 15 part of the documents and that needed to 16 be reinstated. I don't see anything 17 illegal there. But he said a portion, 18 part of the documents. He said some of 19 the documents were missing, part of the 20 documents. He said please call Andrey so 21 that he would get in touch with me so 22 that we could reinstate the documents. 23 Q. Was the \$20 million note 24 signed when the first -- when the money 25 was transferred in 1996 or 1998?</p>

41 (Pages 186 to 189)

<p style="text-align: right;">Page 190</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 MR. LUPKIN: Objection to</p> <p>3 form. You may answer.</p> <p>4 A. Well, generally, I have not</p> <p>5 laid my eyes on the promissory note.</p> <p>6 That's why it is difficult to tell me</p> <p>7 which year. '96 or '99. You can take</p> <p>8 the promissory note and familiarize</p> <p>9 yourself with it or show it to me and I</p> <p>10 will try to extend my comments. But I</p> <p>11 have to study that for that.</p> <p>12 Q. When you say the \$20 million</p> <p>13 note, what note are you referring to?</p> <p>14 A. I never mentioned the \$20</p> <p>15 million note. You are talking about the</p> <p>16 \$20 million note.</p> <p>17 Q. Did Suren tell you he needed</p> <p>18 to backdate a \$20 million note in 2011?</p> <p>19 A. No.</p> <p>20 Q. Do you know what that phrase</p> <p>21 means, to backdate a financial document?</p> <p>22 A. Well, it depends what is the</p> <p>23 interpretation.</p> <p>24 Q. Did Gloriozov refuse to sign a</p> <p>25 backdated \$20 million note?</p>	<p style="text-align: right;">Page 192</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 Q. If the \$20 million was yours,</p> <p>3 why was the backdated note presented to</p> <p>4 Gloriozov and not you?</p> <p>5 MR. LUPKIN: Objection to</p> <p>6 form. You may answer.</p> <p>7 A. I don't think that this phrase</p> <p>8 backdated is applicable here.</p> <p>9 Q. Why not?</p> <p>10 A. Because first of all, I never</p> <p>11 asked about that and when this document</p> <p>12 was presented to me, I asked about this</p> <p>13 phrase, interpretation asked of Suren who</p> <p>14 said that he had not, he had never done</p> <p>15 that. And the same question I put to</p> <p>16 Gloriozov who said that he had not done</p> <p>17 it, and never meant to have done it.</p> <p>18 Q. When you say never meant to</p> <p>19 have done it, what is it?</p> <p>20 A. This expression to have a</p> <p>21 backdated note, promissory note, to make</p> <p>22 a backdated promissory note. But those</p> <p>23 are Gloriozov's words.</p> <p>24 Q. Do you think that Gloriozov is</p> <p>25 lying?</p>
<p style="text-align: right;">Page 191</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 MR. LUPKIN: Objection; lacks</p> <p>3 foundation. You may answer.</p> <p>4 A. Well, honestly, I really, I</p> <p>5 don't understand the question. Please</p> <p>6 once again.</p> <p>7 Q. What's a backdated note?</p> <p>8 A. In order for Gloriozov either</p> <p>9 to agree or to disagree, well, at minimum</p> <p>10 I should have been asked to do that. In</p> <p>11 view of the fact that I did not ask, that</p> <p>12 is why there was no agreement or</p> <p>13 rejection on his part.</p> <p>14 To request that he signs a</p> <p>15 backdated note, I did not ask him. There</p> <p>16 were no requests on my part to him.</p> <p>17 And I think that even this</p> <p>18 kind of interpretation could not even be</p> <p>19 shifted to Suren. But nevertheless, I'm</p> <p>20 only responding, I'm responsible for my</p> <p>21 words.</p> <p>22 MR. LUPKIN: At an appropriate</p> <p>23 time, Jim, I'd like to take a</p> <p>24 break.</p> <p>25 MR. GOLDEN: Okay.</p>	<p style="text-align: right;">Page 193</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 A. Well, I was told the following</p> <p>3 by Gloriozov. I talked to him when I saw</p> <p>4 this document. It was quite recently, it</p> <p>5 was two days ago. When I started asking</p> <p>6 him questions about this document he said</p> <p>7 that the American lawyer named Andrew</p> <p>8 came to see him. He being in the</p> <p>9 government bodies of Luxembourg, he</p> <p>10 signed a paper prepared for him that he</p> <p>11 did not read. He said that he was also</p> <p>12 surprised that some correspondence, some</p> <p>13 email correspondence was shown, I never</p> <p>14 read them, between Suren and himself. He</p> <p>15 made a supposition that it was hacking.</p> <p>16 Well, that is unlawful penetration in the</p> <p>17 computer. And he confirmed that he did</p> <p>18 not compose those papers but they were</p> <p>19 made and brought to him by the American</p> <p>20 lawyer which he signed without looking at</p> <p>21 them.</p> <p>22 Q. Was he referring --</p> <p>23 A. I can only characterize it</p> <p>24 this way. Who -- who came to see him, he</p> <p>25 did not say. I don't know. He said that</p>

42 (Pages 190 to 193)

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1 ASHOT EGIAZARYAN
2 he would find his business card and
3 furnish it.
4 **Q. Is the paper that you're**
5 **referring to, that you discussed with**
6 **Gloriozov this document that we also have**
7 **in front of us?**
8 A. I discussed with him, yes, I
9 think it's the document, although I don't
10 read it in English. I think this is the
11 document that was prepared by the
12 American lawyer.
13 **Q. And he told you, he, and**
14 **Gloriozov told you that Gloriozov signed**
15 **it?**
16 A. Well, I did not ask him if he
17 signed it or not, but I think yes, he
18 signed it. We did not discuss it whether
19 he signed or not, but I think he signed
20 it.
21 **Q. Didn't you say a few minutes**
22 **ago that he told you he signed it without**
23 **reading it?**
24 A. I said that he signed it
25 without reading because he said that it

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1 ASHOT EGIAZARYAN
2 had been drafted, had been not prepared
3 by him but it had been prepared by the
4 American lawyer.
5 **Q. Mr. --**
6 A. And this document is the one
7 that we're talking about and not any
8 other document.
9 **Q. Mr. Gloriozov --**
10 A. I said at the beginning that I
11 had seen it before that.
12 **Q. Mr. Gloriozov speaks English,**
13 **right?**
14 A. Yes. And French.
15 **Q. And he can read English?**
16 A. I think so.
17 **Q. And he can write English?**
18 A. I think so.
19 **Q. Does Suren read and write**
20 **English?**
21 A. Yes.
22 **Q. Did Gloriozov tell you who**
23 **prepared the backdated note?**
24 MR. LUPKIN: Objection;
25 mischaracterizes the testimony and

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1 ASHOT EGIAZARYAN
2 if you're going to be referring to
3 a note, I'd appreciate it if you
4 would refer to it by its number at
5 the bottom right-hand corner so we
6 know what you're talking about. Is
7 there something funny, Mr. Golden?
8 MR. GOLDEN: Yes.
9 MR. LUPKIN: I'd ask you to
10 keep your emotions to yourself.
11 This is a serious proceeding and
12 I'd ask you to comport yourself
13 appropriately.
14 MR. GOLDEN: Sure.
15 **Q. We're talking about a**
16 **promissory note, right?**
17 A. I don't know what, I don't
18 know what we're talking about. Whatever
19 you ask me.
20 **Q. Look at the document that's on**
21 **page 1088. Have you seen that before?**
22 A. No.
23 MR. GOLDEN: Mr. Translator,
24 would you please read the title.
25 (At this time, the requested

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1 ASHOT EGIAZARYAN
2 material was read to the witness.)
3 **Q. Mr. Egiazaryan, do you see the**
4 **amount of the note?**
5 A. Yes.
6 **Q. What's the date of the note?**
7 A. The date is June of 2001. But
8 I cannot see that this note has been
9 signed. I think it's a draft. Well,
10 it's either a rough copy or a draft.
11 Maybe you have a signed promissory note.
12 **Q. Do you know when this note was**
13 **prepared?**
14 MR. LUPKIN: Objection; lacks
15 foundation. You may answer.
16 A. No.
17 **Q. Did you talk to Mr. Gloriozov**
18 **about this note?**
19 A. No. I have said before I did
20 not talk to him in general about
21 promissory notes. I do not even use that
22 word promissory notes. I can repeat what
23 I said.
24 **Q. What did Suren tell you he --**
25 A. Suren said that there were

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<p>1 ASHOT EGIАЗARYAN 2 either missing documents or lost 3 documents. 4 Q. Did he tell you that a note 5 was lost? 6 A. He said to me, and I repeat 7 again, that there were lost documents. 8 To be quite exact, he said part of the 9 documents were lost. 10 Q. Did he -- 11 A. Which have to be prepared. 12 Q. Did -- 13 A. Or reinstated. 14 Q. Did he tell that you a note 15 was lost? 16 MR. LUPKIN: Objection; asked 17 and answered. You may answer 18 again. 19 A. He said documents. 20 Q. Who is -- who is Alexander 21 Ginsburg? 22 A. I don't know. 23 Q. Mr. Egiазaryan, what is a 24 company, do you know a company named -- 25 A. I beg your pardon. Do you</p>	<p>1 ASHOT EGIАЗARYAN 2 holdings limited? 3 A. Yes, I'm familiar with this 4 company. 5 Q. Is that a company that was 6 formed in Cyprus? 7 A. Quite probable. I cannot tell 8 you exactly where it was formed. I just 9 simply I know, I know the company. 10 Q. Was Mr. Gloriovov the nominal 11 owner of Longlake holdings limited? 12 A. I cannot tell you. I just 13 don't know when it was created. I can 14 only say that I'm related to this 15 company, this is true, but how it was 16 formed, in whose name, how it was 17 created, I don't know. 18 Q. Are you familiar with a 19 company named Skendleby Investments 20 Limited? 21 A. No, I don't remember that. I 22 did ask Gloriovov two days ago when I 23 talked to him about these companies. I 24 saw these companies for the first time 25 two days ago. Well that is why my answer</p>
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<p>1 ASHOT EGIАЗARYAN 2 have a signed promissory note? This is 3 just a bare piece of paper. Well for me 4 to make my comments, I think there should 5 be a document that was signed. 6 Q. Are you familiar with a 7 company named Adecco Corporate Service 8 Ltd.? 9 A. Where is it? It's on the last 10 page of this? 11 MR. LUPKIN: For the record 12 it's PZ 001092. 13 A. No. 14 Q. Are you familiar with a 15 company named Mistral Capital Management 16 Ltd.? 17 A. No. 18 Q. Are you familiar with a 19 company named Clemens International 20 Holdings, Inc.? 21 A. No, I don't recall. 22 Q. Before you mentioned a company 23 named Longlake. Is that -- 24 A. Yes. 25 Q. Is that named Longlake</p>	<p>1 ASHOT EGIАЗARYAN 2 to your question if I know these 3 companies, my answer is I don't know. As 4 far as the names of the companies, I saw 5 them two days ago. If two days ago means 6 that I did know these companies, I just 7 want to be precise and clear in my 8 responses to your questions. 9 I did ask Gloriovov why these 10 companies were listed, these names were 11 listed. He responded to me. 12 Q. What did he say? 13 A. He said that this was what 14 that American lawyer brought to me and he 15 said he didn't know why those companies 16 were written there. I asked where these 17 companies were engaged, maybe some assets 18 were in those companies. He said that he 19 was unaware of that. 20 Q. Did he tell you that he signed 21 the sheet of paper? 22 A. No, we did not discuss this 23 question. I can tell you the way it 24 happened. I read these companies to him 25 and asked the same question as you asked</p>

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<p style="text-align: right;">Page 202</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 me, what are these companies. I said</p> <p>3 were they created by you. He said maybe</p> <p>4 I did create but I don't remember. I</p> <p>5 said well, do they own something in these</p> <p>6 companies, are they in operation</p> <p>7 somewhere, he said I don't remember. He</p> <p>8 said an American lawyer brought this</p> <p>9 document. That's the source of these</p> <p>10 companies.</p> <p>11 I don't know who came to see</p> <p>12 him and which American lawyer had</p> <p>13 prepared the document.</p> <p>14 Q. You did --</p> <p>15 A. I think were imposed on him.</p> <p>16 Q. You did say that Longlake</p> <p>17 Holdings Limited was the Longlake company</p> <p>18 that you mentioned earlier today, right?</p> <p>19 A. I think so.</p> <p>20 MR. GOLDEN: Ryan, what's our</p> <p>21 running time?</p> <p>22 THE VIDEOGRAPHER: Six hours</p> <p>23 and 11 minutes on the record.</p> <p>24 MR. GOLDEN: We can take a</p> <p>25 break now if you want. What do you</p>	<p style="text-align: right;">Page 204</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 Q. Is the statement in the first</p> <p>3 sentence of paragraph 5 correct?</p> <p>4 MR. LUPKIN: Point of</p> <p>5 clarification, you're asking</p> <p>6 whether it's correct or whether or</p> <p>7 not it's written there?</p> <p>8 Q. I'm asking, I'm asking if it's</p> <p>9 correct.</p> <p>10 A. Please read it to me. Please</p> <p>11 read paragraph 2 with the names of the</p> <p>12 companies.</p> <p>13 THE INTERPRETER: Do you want</p> <p>14 me to comply with this?</p> <p>15 MR. GOLDEN: Yes, please,</p> <p>16 please.</p> <p>17 A. Please read me the names, the</p> <p>18 names of the companies which are in</p> <p>19 paragraph 2 for me to say if I know them</p> <p>20 or not. Please read the names of the</p> <p>21 companies in paragraph 2.</p> <p>22 THE INTERPRETER: The</p> <p>23 interpreter's remark, I'm not</p> <p>24 finding the names of the companies</p> <p>25 in paragraph 2.</p>
<p style="text-align: right;">Page 203</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 want to do?</p> <p>3 THE VIDEOGRAPHER: The time is</p> <p>4 6:48 p.m., we're off the record.</p> <p>5 (A recess was taken.)</p> <p>6 THE VIDEOGRAPHER: The time is</p> <p>7 7:02 p.m., we're back on the</p> <p>8 record.</p> <p>9 MR. GOLDEN: Mr. Translator,</p> <p>10 would you read paragraph 5 to the</p> <p>11 witness, please.</p> <p>12 THE INTERPRETER: Of which</p> <p>13 document?</p> <p>14 MR. GOLDEN: The document we</p> <p>15 were looking at before, 143.</p> <p>16 THE INTERPRETER: Okay, thank</p> <p>17 you.</p> <p>18 (At this time, the requested</p> <p>19 material was read to the witness.)</p> <p>20 Q. Mr. Egiazaryan, the beginning</p> <p>21 of paragraph 5 says that Artem was</p> <p>22 involved in some of the companies that</p> <p>23 are listed at the end of this package; is</p> <p>24 that correct?</p> <p>25 A. What is your question?</p>	<p style="text-align: right;">Page 205</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 Q. In paragraph 2 Mr. Gloriov</p> <p>3 refers to a group of offshore companies.</p> <p>4 Was Artem involved in some of those</p> <p>5 offshore companies that Mr. Gloriov</p> <p>6 formed for you?</p> <p>7 MR. LUPKIN: Objection to</p> <p>8 form. You may answer.</p> <p>9 A. You translated to me that in</p> <p>10 paragraph 5 states, paragraph states,</p> <p>11 yes, that there are companies referenced</p> <p>12 in paragraph 2. Paragraph 5 states that</p> <p>13 paragraph 2 gives a list of companies</p> <p>14 that I am supposed to know. Maybe I</p> <p>15 misunderstood the translation.</p> <p>16 Q. Were there offshore companies</p> <p>17 that Mr. Gloriov formed that Artem was</p> <p>18 involved in with you?</p> <p>19 A. I fail to understand. Once</p> <p>20 again, please. I was given a quotation</p> <p>21 from paragraph 5, which states, the way</p> <p>22 it was translated to me, that in -- that</p> <p>23 in paragraph 2 there is a list of</p> <p>24 companies which I am supposed to</p> <p>25 identify. Shall I answer this question</p>

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<p>1 ASHOT EGIАЗARYAN</p> <p>2 or not?</p> <p>3 Q. I'll ask another question.</p> <p>4 A. Okay.</p> <p>5 Q. Referring to paragraph 5, was</p> <p>6 one of the reasons why Mr. Gloriov was</p> <p>7 the nominal owner of these companies to</p> <p>8 minimize your and Artem's involvement?</p> <p>9 Excuse me, to -- let me start again, I</p> <p>10 misspoke.</p> <p>11 Referring to paragraph 5 is</p> <p>12 one of the reasons why Mr. Gloriov was</p> <p>13 the nominal owner of certain companies to</p> <p>14 minimize your and Artem's identification</p> <p>15 and direct involvement with the</p> <p>16 companies?</p> <p>17 A. Yes, what is your question?</p> <p>18 Q. Is what I said correct?</p> <p>19 A. I would not say, I would not</p> <p>20 put it that way.</p> <p>21 Q. Why was Gloriov the nominal</p> <p>22 owner of companies that you were the real</p> <p>23 owner of?</p> <p>24 MR. LUPKIN: Objection; lacks</p> <p>25 foundation. You may answer.</p>	<p>1 ASHOT EGIАЗARYAN</p> <p>2 not aware of other ways.</p> <p>3 Q. Couldn't you own those</p> <p>4 companies directly?</p> <p>5 A. Well, there are many forms of</p> <p>6 ownership and management of these</p> <p>7 companies. Usually a form that is simple</p> <p>8 and does not contradict the laws is</p> <p>9 chosen. Why this particular form was</p> <p>10 determined, because it was the simplest</p> <p>11 and most effective, efficient form.</p> <p>12 Well, for example, let's take</p> <p>13 a Russian company. I could not have</p> <p>14 opened accounts in foreign banks for that</p> <p>15 Russian company. I should have received</p> <p>16 permission of the Central Bank for that,</p> <p>17 which is practically impossible, and it's</p> <p>18 impossible technically.</p> <p>19 To open up accounts, to open</p> <p>20 up accounts for an offshore company I</p> <p>21 mean in foreign banks, that's elementary</p> <p>22 simple.</p> <p>23 At times the banks themselves,</p> <p>24 Deutsche Bank, they told about this to</p> <p>25 open up those companies to get credits</p>
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<p>1 ASHOT EGIАЗARYAN</p> <p>2 A. I have responded already to</p> <p>3 this question. I can repeat. I cannot</p> <p>4 state that Gloriov was a nominal, the</p> <p>5 nominal owner of these companies. That</p> <p>6 is why, that is why the issue that I --</p> <p>7 so in order that I would not be</p> <p>8 identified behind these companies and he</p> <p>9 would be the beneficiary owner, that is</p> <p>10 not a correct question. Because as I</p> <p>11 said in the beginning, one had to operate</p> <p>12 these companies, open up, register these</p> <p>13 companies, open up accounts in the banks,</p> <p>14 process documents tax declarations and</p> <p>15 many, many papers, a lot of bureaucratic</p> <p>16 paperwork.</p> <p>17 Gloriov was a trusted person</p> <p>18 and according to the Russian laws that's</p> <p>19 a norm, the function of a trustee.</p> <p>20 Q. Why did you use that form?</p> <p>21 A. Because everybody used it.</p> <p>22 That is a norm in Russia.</p> <p>23 Q. But why did you choose to do</p> <p>24 it that way?</p> <p>25 A. Because I was not aware, I was</p>	<p>1 ASHOT EGIАЗARYAN</p> <p>2 from the bank. So the credits to the</p> <p>3 tune of a hundred million dollars, there</p> <p>4 was a credit for \$600 million, those</p> <p>5 credits were received for offshore</p> <p>6 companies. And that was the precondition</p> <p>7 of banks.</p> <p>8 Q. What company of yours borrowed</p> <p>9 \$600 million?</p> <p>10 A. This, the borrower was a</p> <p>11 company called Falmira Falmira.</p> <p>12 Falmira Q. Who was the nominal owner of</p> <p>13 Falmira Gogokhiya</p> <p>14 A. Gogohia, G-a-g-o-h-i-a.</p> <p>15 That's on my part. And on the part of</p> <p>16 Arkady Rotenberg, he was represented by</p> <p>17 his brother, Boris Rotenberg. Gogokhiya</p> <p>18 Q. What is Mr. Gagohia, is that</p> <p>19 the name?</p> <p>20 A. Well, I have already spoken</p> <p>21 about him, Vitali Gagohia Gogokhiya</p> <p>22 Q. And Falmira, when was Falmira</p> <p>23 formed? Falmira Falmira</p> <p>24 A. I don't remember the year. It</p> <p>25 was registered approximately 2007.</p>

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<p style="text-align: right;">Page 210</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 Q. And what was the purpose of</p> <p>3 Falmira? <i>Falmira</i></p> <p>4 A. It was an offshore company, I</p> <p>5 don't recall, maybe Cyprus or BVI to</p> <p>6 obtain, to obtain a credit.</p> <p>7 Q. What was the loan used for?</p> <p>8 A. That credit was supposed to be</p> <p>9 used for the construction of the Moscow</p> <p>10 Hotel, also an offshore company. If we</p> <p>11 had used a Russian company, Deutsche Bank</p> <p>12 would not have issued a credit to us.</p> <p>13 That is why it is a convenient form</p> <p>14 allowing to obtain financing. Absolutely</p> <p>15 lawful and legal.</p> <p>16 Q. You mentioned, you mentioned</p> <p>17 another offshore company that borrowed</p> <p>18 money. I think you said 300 million.</p> <p>19 What company was that?</p> <p>20 A. I don't remember saying that.</p> <p>21 Q. Did you mention another</p> <p>22 offshore company that you used to get</p> <p>23 credit?</p> <p>24 A. For three million, no, I don't</p> <p>25 think I said it, some misunderstanding.</p>	<p style="text-align: right;">Page 212</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 A. Approximately 75 million.</p> <p>3 Q. What was the money used for?</p> <p>4 A. The construction.</p> <p>5 Q. You said before that Mr.</p> <p>6 Gloriov was trusted. Do you still</p> <p>7 trust him?</p> <p>8 A. Well, I think I don't have any</p> <p>9 basis not to trust him. Well, although</p> <p>10 there are some issues. Actually, one</p> <p>11 question, one issue, one question that</p> <p>12 throws some doubt and that is why this</p> <p>13 particular document surfaced. I don't</p> <p>14 have any other foundation, reasons to</p> <p>15 doubt his decency, but I learned about</p> <p>16 this only two days ago.</p> <p>17 THE INTERPRETER: The</p> <p>18 interpreter's remark: Indicating</p> <p>19 with his fingers to Exhibit 143.</p> <p>20 Q. Do you know where Sergei</p> <p>21 Ponomarev is?</p> <p>22 A. I saw -- the last time I saw</p> <p>23 Sergei Ponomarev probably about five</p> <p>24 years ago. That is why I don't know</p> <p>25 where he exactly is at this moment.</p>
<p style="text-align: right;">Page 211</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 For \$300 million.</p> <p>3 THE INTERPRETER: I think you</p> <p>4 mentioned \$100 million, he</p> <p>5 mentioned.</p> <p>6 A. Yes, he confirmed that, he</p> <p>7 said a hundred million.</p> <p>8 Q. What company was that?</p> <p>9 A. Blidensol. <i>Blidensol</i></p> <p>10 Q. Who was the nominal owner of</p> <p>11 Blidensol? <i>Blidensol</i></p> <p>12 A. Gagohia was. <i>Gagokhiya</i></p> <p>13 Q. Was the hundred million dollar</p> <p>14 loan to Blidensol made, was the money</p> <p>15 transferred? <i>Blidensol</i></p> <p>16 A. Yes.</p> <p>17 Q. What was the money used for?</p> <p>18 A. Mainly for the Moscow Hotel,</p> <p>19 the construction of Moscow Hotel.</p> <p>20 Q. Was the \$600 million to Falmira,</p> <p>21 Falmira, was that loan actually made?</p> <p>22 A. A contract was concluded, was</p> <p>23 signed and part of it, part of that money</p> <p>24 was used.</p> <p>25 Q. How much?</p>	<p style="text-align: right;">Page 213</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 Q. Do you know when is the last</p> <p>3 time that Mr. Gloriov gave Mr.</p> <p>4 Ponomarev some of your money to handle?</p> <p>5 A. I think it was at the time</p> <p>6 when the money was transferred, because</p> <p>7 as far as I understand, the money was</p> <p>8 transferred to the company that Ponomarev</p> <p>9 created.</p> <p>10 MR. GOLDEN: Mr. Translator,</p> <p>11 would you please read paragraph 6.</p> <p>12 (At this time, the requested</p> <p>13 material was read to the witness.)</p> <p>14 A. I would also like to go back</p> <p>15 to the portion that was translated. The</p> <p>16 way I understand that was read to me,</p> <p>17 that the money was used for me -- when</p> <p>18 the money was transferred the money was</p> <p>19 use for me.</p> <p>20 THE INTERPRETER: Is that</p> <p>21 correct, do you want me to read it</p> <p>22 again?</p> <p>23 MR. GOLDEN: Oh, he wants you</p> <p>24 to read something to him?</p> <p>25 THE INTERPRETER: Right.</p>

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<p>1 ASHOT EGIАЗARYAN 2 MR. GOLDEN: Sure. 3 A. I think you have read it today 4 that the money that was transferred by 5 Gloriovov was used for my keep, for my 6 stay in America. Or who did you mean, me 7 when you read it to me? Was it for me? 8 Was it my name that indicated there. In 9 this document? 10 MR. GOLDEN: Mr. Translator, 11 he's probably referring to the 12 third or fourth line from the 13 bottom in paragraph 3. 14 THE INTERPRETER: Oh, I found 15 it. Three, I found it. Do you 16 allow me to read it? 17 MR. GOLDEN: Yes. 18 THE INTERPRETER: "So when I 19 reached that place, account to pay. 20 When I reached reading this line, 21 to pay Egiазaryan's expenses in Los 22 Angeles for approximately ten 23 years," the witness asked the 24 question "which Egiазaryan." 25 MR. GOLDEN: So would you read</p>	<p>1 ASHOT EGIАЗARYAN 2 Q. So did Mr. Gloriovov transfer 3 \$3 million on your behalf from 000 4 Decorum to Mogford Impex? 5 A. Quite possible. 6 Q. What is Mogford Impex 7 Corporation? 8 A. This company was engaged in 9 investments to purchase a jet. 10 MR. VESLER: Aircraft. 11 A. An investment. To purchase a 12 jet, an aircraft, a plane as an 13 investment with subsequent sales, 14 subsequent selling that. 15 Q. Who owned Mogford Impex? 16 A. At that time, it was created 17 either by Gloriovov -- well, at that time 18 I cannot tell you exactly who formed that 19 company. I think it was owned by Suren. 20 No, not Suren, no, I'm telling the wrong 21 thing. Artem owned it. 22 Q. Did Mr. Gloriovov operate it? 23 A. I don't think so. 24 Q. Did Mr. Gloriovov handle bank 25 transactions for it?</p>
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<p>1 ASHOT EGIАЗARYAN 2 him paragraph 6, please. 3 (At this time, the requested 4 material was read to the witness.) 5 A. I wanted to understand it for 6 myself, for my understanding. 7 MR. LUPKIN: Why don't you let 8 Mr. Golden ask questions and we can 9 talk about this at another time. 10 A. Are you talking about me? 11 THE INTERPRETER: What was 12 your question? 13 MR. GOLDEN: Read paragraph 6 14 to him, please. 15 (At this time, the requested 16 material was read to the witness.) 17 A. Yes, I've heard it. 18 Q. Did Mr. Gloriovov transfer \$3 19 million from 000 Decorum Corp. to Mogford 20 Impex Corporation? 21 A. I can say that Mr. Gloriovov 22 doesn't own Decorum. That's why it's not 23 correct here. 24 Q. Who owns Decorum? 25 A. I do.</p>	<p>1 ASHOT EGIАЗARYAN 2 A. Quite probable. 3 Q. Was Mogford Impex used for any 4 purpose other than purchasing a jet? 5 MR. LUPKIN: Don't speculate. 6 A. I think that no, it wasn't. 7 Again, this is not my company. 8 Q. Why did you put -- 9 A. I was not aware of any other 10 investments. 11 Q. Do you know -- other than 12 money that was given to Mogford Impex by 13 you, how did Mogford Impex get money? 14 A. I think it was the money that 15 was invested by SP Capital that I have, 16 that I had mentioned before, that it -- 17 that was in Nevada. This was just the 20 18 million, part of that was the 20, of the 19 \$20 million I had talked about before. 20 So that money was like as investment, as 21 far as I know. 22 Q. Other than the \$3 million that 23 you transferred or was transferred for 24 you from 000 Decorum to Mogford, where 25 else did Mogford get money?</p>

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1 **ASHOT EGIAZARYAN**
 2 A. Decorum, Mogford I've just
 3 said that.
 4 **Q. Did Mogford get money from SP**
 5 **Capital?**
 6 A. Whether they -- whether it was
 7 transferred directly or indirectly, that
 8 was the money that had been transferred
 9 to SP Capital either in 1996 or 1998.
 10 **Q. You mentioned before that you**
 11 **gave Mr. Gloriozov \$60 million to handle.**
 12 **Do you remember that?**
 13 A. I do.
 14 **Q. And you said a few minutes ago**
 15 **that the \$20 million that went to SP**
 16 **Capital you weren't sure whether it was**
 17 **part of the 60 million or not?**
 18 A. No, that was included.
 19 Generally totaling, it was approximately
 20 60 million. Out of that money, about,
 21 about 40 million were the losses, were
 22 lost then the balance approximately was
 23 20 million.
 24 **Q. In around 2000, what was your**
 25 **net worth?**

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1 **ASHOT EGIAZARYAN**
 2 **MR. LUPKIN:** Objection to
 3 form. You may answer.
 4 A. I cannot tell you.
 5 **Q. Was it more than a hundred**
 6 **million dollars?**
 7 A. I cannot tell you because, you
 8 know, I have to be precise, exact here,
 9 and it's difficult for me to guess.
 10 Because there were some successful
 11 investments, were some unsuccessful
 12 investments, there were losses. Really I
 13 cannot tell you exactly.
 14 **Q. Was the \$60 million that you**
 15 **gave to Gloriozov all your entire net**
 16 **worth?**
 17 **MR. LUPKIN:** Objection to
 18 form. You may answer.
 19 A. Well, it was not my whole net
 20 worth. Those were the monies of
 21 companies -- well, in Russia, let me
 22 emphasize again, net worth is considered
 23 the wealth that you own directly. This
 24 was the money of the family. Part of the
 25 money was the money that was left by my

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1 **ASHOT EGIAZARYAN**
 2 father after he passed away. We did not
 3 have separation, separation of money in
 4 the family, exact separation.
 5 Because of that, I cannot give
 6 you the exact amount on some definite
 7 date.
 8 **Q. Approximately how much money**
 9 **did your father leave?**
 10 A. He left approximately about 10
 11 million for the family.
 12 **Q. Did you say before that your**
 13 **definition of net worth includes only**
 14 **assets that are directly owned?**
 15 A. Yes.
 16 **Q. So if something is owned by**
 17 **Mr. Gloriozov on your behalf, do you**
 18 **exclude that from net worth?**
 19 A. Well, the money that
 20 Gloriozov, the money that Gloriozov had,
 21 that money was owned by the family, not
 22 all the money of his, of that money was
 23 mine. I couldn't grab that money, put it
 24 in my pocket and say that is mine.
 25 **Q. So the 60 million that you**

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1 **ASHOT EGIAZARYAN**
 2 **gave to Gloriozov you said was your whole**
 3 **family's?**
 4 A. Yes. Well there were other
 5 projects, there were other projects in
 6 Russia at that time. This was about
 7 1996, like 20 years ago. So I cannot
 8 give you the exact list of what was
 9 happening at that time.
 10 **Q. Did Artem earn money from his**
 11 **own business deals?**
 12 A. I find it difficult to speak
 13 for other -- for Artem and other people
 14 how much they made.
 15 **Q. Did Artem contribute money to**
 16 **Gloriozov that he made in his own**
 17 **business deals?**
 18 **MR. GOLDEN:** The reporter
 19 tells me we're out of tape, so why
 20 don't we call it a day.
 21 **THE VIDEOGRAPHER:** This ends
 22 tape 4 in the deposition of Ashot
 23 Egiazaryan, the time is 7:42, we're
 24 off the record.
 25 The time is 7:42 p.m., we're

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<p>1 ASHOT EGIAZARYAN</p> <p>2 back on the record.</p> <p>3 A. I find it difficult to answer</p> <p>4 this question.</p> <p>5 THE VIDEOGRAPHER: This ends</p> <p>6 tape 4 in the deposition of Ashot</p> <p>7 Egiazaryan. The time is 7:43 p.m.,</p> <p>8 we're off the record.</p> <p>9 (The following took place off</p> <p>10 the video record:)</p> <p>11 MR. LUPKIN: Before we go off</p> <p>12 the stenographic tape, my</p> <p>13 understanding, having spoken with</p> <p>14 Mr. Egiazaryan, is that he's</p> <p>15 prepared to continue tonight for at</p> <p>16 least another hour or two if you're</p> <p>17 inclined to do so.</p> <p>18 MR. GOLDEN: No, I think we've</p> <p>19 gone to within 10 minutes of 7</p> <p>20 hours of questioning for the day,</p> <p>21 so.</p> <p>22 MR. LUPKIN: Your choice.</p> <p>23 MR. GOLDEN: We'll call it and</p> <p>24 we'll pick it up tomorrow.</p> <p>25 MR. LUPKIN: 10 a.m.?</p>	<p>1 NAME OF CASE: Egiazaryan v. Zalmayev</p> <p>DATE OF DEPOSITION: January 18, 2012</p> <p>2 NAME OF WITNESS: Ashot Egiazaryan</p> <p>I wish to make the following changes, for</p> <p>3 the following reasons:</p> <p>PAGE LINE</p> <p>4 CHANGE: _____</p> <p>5 REASON: _____</p> <p>6 CHANGE: _____</p> <p>7 REASON: _____</p> <p>8 CHANGE: _____</p> <p>9 REASON: _____</p> <p>10 CHANGE: _____</p> <p>11 REASON: _____</p> <p>12 CHANGE: _____</p> <p>13 REASON: _____</p> <p>14 CHANGE: _____</p> <p>15 REASON: _____</p> <p>16 CHANGE: _____</p> <p>17 REASON: _____</p> <p>18</p> <p>19 Subscribed and sworn to before me</p> <p>20 this ____ day of _____, 2012.</p> <p>21</p> <p>22</p> <p>23</p> <p>24 (Notary Public) My Commission Expires:</p> <p>25</p>
Page 223	Page 225
<p>1 ASHOT EGIAZARYAN</p> <p>2 MR. GOLDEN: Yes, ten is good.</p> <p>3 (Time noted: 7:43 p.m.)</p> <p>4</p> <p>5</p> <p>6 ASHOT EGIAZARYAN</p> <p>7</p> <p>8 Subscribed and sworn to before me</p> <p>9 this ____ day of _____, 2012.</p> <p>10</p> <p>11 _____</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 C E R T I F I C A T E</p> <p>2 STATE OF NEW YORK)</p> <p>3 : ss.</p> <p>4 COUNTY OF NEW YORK)</p> <p>5</p> <p>6 I, GAIL F. SCHORR, a Certified</p> <p>7 Shorthand Reporter, Certified Realtime</p> <p>8 Reporter and Notary Public within and for</p> <p>9 the State of New York, do hereby certify:</p> <p>10 That ASHOT EGIAZARYAN, the</p> <p>11 witness whose deposition is hereinbefore set</p> <p>12 forth, was duly sworn by me and that such</p> <p>13 deposition is a true record of the testimony</p> <p>14 given by the witness.</p> <p>15 I further certify that I am not</p> <p>16 related to any of the parties to this action</p> <p>17 by blood or marriage, and that I am in no</p> <p>18 way interested in the outcome of this</p> <p>19 matter.</p> <p>20 IN WITNESS WHEREOF, I have</p> <p>21 hereunto set my hand this ____ day of</p> <p>22 _____, 2012.</p> <p>23</p> <p>24</p> <p>25 GAIL F. SCHORR, C.S.R., C.R.R.</p>

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EXHIBITS

DESCRIPTION	PAGE	LINE
(Exhibit 141 for identification, Bates stamped PZ 001543.)	76	14
(Exhibit 142 for identification, six-page article.)	120	21
(Exhibit 143 for identification, Bates stamped PZ 001084 through 1092.)	164	25